GROUP HUMAN RESOURCE POLICIES & PROCEDURES MANUAL

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Message from the Group CEO

Dear Colleagues,

It is my pleasure to present to you the Centum Human Resources Policies and Procedures Manual.

The objective of this manual is to provide us with a set of guiding principles that will guide our interaction with the company and amongst ourselves. This manual explains in detail what is expected of us by both the Organization and our Colleagues and in the same token sets out what we should expect from both the Company and our Colleagues.

It is important to note that this manual is not intended to be a complete and exhaustive guide of how we should conduct ourselves while doing business. Centum is a principle rather than a rule- oriented organization and we are united in our mission of creating real tangible wealth by providing the channel through which investors access and build extraordinary enterprises in Africa. In achieving this mission, we are guided by four core values, which should inform us of the decisions we take. These values are:

a) Deliver to promise
b) Invest responsibly
c) Value our people
d) Learn and innovate

These values are further reinforced by the Centum brand pillars which are:

a) Focused: experts, innovative, consistent;
b) Responsible: ethical, moral, diligent;
c) Global: global standards, global capacity; and
d) Ambitious: think big, ambition, venturing and foresight.

This manual is intended to complement the organization's values and brand pillars, and it is my expectation that we will all familiarize ourselves with its contents and aspire to always uphold and remain true to Centum's brand.

I wish you all the best and God's blessings as we journey on to becoming Africa's foremost Investment channel.

Yours Sincerely,

Dr. James Mworia

Group Chief Executive Officer

Who Are We?

Centum Investment Company PLC (Centum) is the largest publicly quoted investment company in Kenya. Formerly ICDCI, the company was incorporated in 1967, and its key business is investing capital in various assets for an investment return. We represent over 37,000 shareholders and our shares are listed on the Nairobi Securities Exchange and the Uganda Securities Exchange.

By virtue of being a collective investment vehicle, Centum positions itself as an investment channel through which other investors are able to access diversified investments and management expertise.

Centum was incorporated at a time when the newly independent country of Kenya was shaping itself on achieving independence. With many emerging opportunities, few Kenyans had the financial capacity to make substantial investments. The company was founded to pool the resources of individual citizens into a large shareholder base that would enable broad ownership of investments beyond the range of a single individual.

In 2009, Centum embarked on an aggressive Pan African strategy that saw the company re-organized into three distinct business lines; Private Equity (PE), Quoted Private Equity (QPE) and Real Estate business line (RE&I). Over time the business lines evolved and rebranded to become independent entities. Each of these subsidiaries run as independent profit generating businesses and provide services to Centum, its subsidiaries and Associates companies.

In our current strategy period; Centum 3.0; we have focused our development activities in eight key sectors of the economy, namely, Real Estate, Financial Services, Fast Moving Consumer Goods (FMCG), Power, Agribusiness, Education, HealthCare and ICT. We are currently active in four of these sectors; Real Estate, Financial Services, FMCG and Power.

Centum's Vision and Mission

Our vision is to be Africa's foremost investment channel.

Our mission is "to create real, tangible wealth by providing the channel through which investors access and build extraordinary enterprises in Africa".

Our Golden Rules

In our endeavor to realize our vision and mission, we have invested in the best talent in the region and have embraced a culture of entrepreneurship, initiative and high performance which have been the pillar of success for our business.

We embrace passion for business and are guided by the fourteen golden rules.

1. We think Positively
2. It's our business; We create and Share value
3. We don't do tomorrow what we could have done yesterday
4. We escalate solutions never the problems
5. We move with speed and when in doubt, we move even faster
6. Good enough is never good enough.
7. We believe that no great business was built working Monday to Friday with a 1-hour lunch break
8. We talk less and deliver more.
9. We do not email where a conversation will do.
10. We think big, enjoy ourselves, learn and teach.
11. A bad decision is better than indecision
12. We get it done!
13. We create tangible wealth
14. Integrity! Integrity! Integrity.

Our Core Values

1. Deliver to promise
2. Invest responsibly
3. Value our people
4. Learn and innovate

Definition of Terms

Unless the context otherwise requires, the words and expressions used have the meanings assigned to them as follows.

"Annual Leave" means yearly leave to which an employee is legally entitled to take an official break from his official duties and rest

"Beneficiary" means any person appointed or designated as such by the employee as a recipient of benefits resulting from death of that employee or former employee of Centum.

"Bullying" means any behavior, occasional or persistent, by peers, management or any individual that intimidates or oppresses another, in public or in private

"Calendar Year" means the period from 1st January to 31st December inclusive.

"Centum or the Company" means Centum Investment Company Limited

"Contract" means a binding agreement between the employee and Centum setting out terms and conditions of employment.

"Dependant" shall mean a spouse and/or dependent children.

"Dependent Child" means an employee's natural child or legally adopted child or stepchild living with the employee, who is not gainfully employed. All dependent children must be declared at the time of appointment or at the time of birth or adoption if it occurs during employment with Centum.

"Disciplinary Committee" means a committee set up to handle disciplinary matters. It shall be ad hoc on a case-by-case basis.

"Discrimination" means treating a person less favorably than another person in comparable circumstances especially on the grounds of gender, color, language, religion, political or other opinion, nationality, ethnic or social origin, marital status, sexual orientation, pregnancy, tribe, disability, age, and health status.

"Employee or staff "means a person employed by Centum for wages or a salary and includes an apprentice and indentured learner.

"Executive Directors" means the Board of Directors of Centum

"Executive Team" means the Heads of Business Units or Heads of Department within Centum

"Grade" means a grouping encompassing jobs with the same values to facilitate salary administration

"Group Chief Executive Officer" means the principal executive officer of the holding company appointed by the Board and shall include the official acting in his capacity during his absence

"Grievance" means a complaint; a feeling of injustice or unfairness which comes to the attention of supervisors or other members of management

"Guideline" means a standard or principle used to make a judgment or determine a policy or course of action.

"Head of Business Unit" means any person who is in charge of a Business Unit

"Head of Department or Line Manager" means any person who is in charge of a Department.

"Immediate Family" means the employee's recognized spouse, dependent children, parents and siblings.

"Intellectual Property" means trademarks, copyrights, patents and any other work created by an employee during employment with Centum

"Job Description" means a formal account of an employee's responsibilities

"Job Evaluation" means systematic process of awarding relative weight to jobs using commensurate job factors that are similar to every job to derive job grades

"Leave" means the official off duty

"Officer" includes "employee" except where otherwise stated or implied.

"Promotion" means the advancement of an employee to the next grade upon being given a satisfactory performance appraisal.

"Probationary period" means a period of observation, during which an employee shall demonstrate, through his professional competence, good conduct, physical and mental fitness that he can assume duties and responsibilities as required by the company for confirmation into the respective position

"Redundancy "means shall mean the loss of employment, occupation, job or career by involuntary means through no fault of an employee

"Regulation "means Human Resource Policies and Procedures Manual

"Relative" means spouse, children, parents, siblings or any individual who subsequently acquires such a relationship through marriage

"Remuneration" means the total value of all payments in money or in kind, made or owing to an employee arising from the employment.

"Resignation" means the voluntary written or oral notification by an employee that they intend to terminate their employment.

"Salary" means the pay to an employee monthly for services rendered to the Company

"Senior Management / Management" means the Chief Executive Officer and Heads of Business Unit and Heads of Department

"Separation" means cessation of an employee from the company's service

"Spouse" means legally recognized partner of an employee. For the purposes of personnel records, Centum shall recognize only one legal spouse. The spouse must be declared at the time of appointment or at the time of marriage if it occurs during employment with Centum. Any change of spouse shall be accompanied by proper documentation

"Summary Dismissal" means termination of employment without notice as a result of a gross misconduct

"Supervisor" means person in the first line of management who monitors and regulates employees in their performance of assigned or delegated tasks

"The Board" means the Nomination and Governance Committee of the Executive Directors.

Unless otherwise provided, words implying the masculine gender also include the feminine gender; words in the singular include the plural.

Abbreviations

"ARV" Stands for Anti-Retroviral treatment

"CEO" Stands for Chief Executive Officer

"DOSHS" Stands for Directorate of Occupational Safety and Health Services

"Ex-Co" Stands for Executive Committee

"FY" Stands for Financial Year

"HBU" Stands for Head of Business Unit

"HoD" Stands for Head of Department

"HIV / AIDS" this means the Human Immunodeficiency Syndrome Virus that weakens the body's immune system, ultimately causing AIDS

"HR" Stands for Human Resource(s)

"ICT" this means Information Communications Technology

"MT" means Management Trainee

"USD" means US Dollars

Statutory deductions shall include: -

i. **P.A.Y.E. -** Pay As You Earn
ii. **N.S.S.F. -** National Social Security Fund
iii. **S.H.I.F. - Social Health** Insurance Fund
iv. A.H.L. – Affordable Housing Levy
v. NITA- National Industrial Training Authority

"VCT" This means Voluntary Counselling and Testing. A process that allows people to willingly know their Serostatus to help them plan their lives and make informed decision

1 INTRODUCTION

1.1 The purpose of the Human Resource Policy Manual

This manual contains statements of Human Resource policies and procedures to be followed by all employees. It is intended to serve as a reference and working guide for management in the administration of Centum's Human Resources policies, procedures and practices. It is designed to be a working guide for all employees in the day-to-day administration of Centum's Human Resources program.

These documented policies and procedures govern the employment, compensation, rules and responsibilities of all employees and must be familiarized by all employees. It is binding to the employee as part of the contract of employment.

These written policies should increase understanding, eliminate the need for personal decisions on matters of company policy and help ensure uniformity throughout the company.

In areas where employee requires clarification, the Human Resource Manager should be consulted for guidance and interpretation of any section of the Manual as well as for cases that may not have been specifically covered.

1.2 Applicability

Every employee shall apply these policies irrespective of their position or duration of employment. In addition, each employee has a responsibility to assist with the implementation of the policies and procedures described and documented in this manual.

1.3 Scope

This policy applies to all employees, including full-time, part-time, contract workers, interns, and temporary staff across all the locations that the company operates in.

1.4 Responsibility

All employees will be held responsible for reading and understanding these regulations and any amendments that will be made as and when the Executive Directors deem necessary. Heads of Department and Supervisors must ensure that all employees under them, irrespective of cadre, are made aware of sections of this Manual which cover their terms and conditions of service. Ignorance of any of these regulations will not be accepted as an excuse for failure to act upon any matter or comply with the regulations as laid down in this Manual.

1.5 Delegation of Authority

At Centum, the delegation of authority is a key principle in promoting efficiency, accountability, and empowerment across all levels of the Group. It involves the transfer of decision-making responsibility from higher management to designated individuals or teams, ensuring that tasks are handled at the appropriate levels. The delegation of authority shall be communicated through job descriptions, performance management, and specific written authorizations. This process allows employees to take ownership of specific duties, while maintaining overall alignment with company objectives and values to ensure that decisions are made within the scope of delegated powers, and that accountability is upheld. Delegation fosters professional development, improves workflow efficiency, and encourages a culture of trust and responsibility within the Group. Any changes to delegation of authority must be formally documented and communicated to the concerned parties in writing

1.6 Distribution of the manual

This manual will be distributed to all employees. In addition, the manual will be placed in a centralized location like the intranet.

1.7 Organizational Structure

Centum Groups organizational structure is designed to foster clear communication, efficient decision-making, and seamless collaboration across all levels of the company. The structure is hierarchical, with distinct roles and responsibilities that align with the company's goals and strategic objectives. It promotes a culture of accountability, where authority and responsibilities are clearly defined at each level, from the Executive level, senior management to individual contributors. This framework supports the effective delegation of tasks, enables optimal resource utilization, and ensures that employees are empowered to take ownership of their roles while working toward Centum's overarching vision. The organizational structure is regularly reviewed to ensure it adapts to the evolving needs of the company and the business environment.

1.8 Effective Date & Acknowledgement

This revised HR Manual is effective as of February 2025. All policies, procedures, and guidelines outlined herein supersede any previous versions and are applicable to all employees of Centum from this date forward. It is the responsibility of all employees to familiarize themselves with the contents of this manual, purpose to adhere to its provisions and acknowledge and acknowledge in writing through the form under clause 23 of this manual and

2 EMPLOYEE RESOURCING

2.1 Introduction

The Employee Resourcing Policy at Centum is designed to ensure that the company attracts, develops, and retains a highly skilled and diverse workforce to meet its strategic goals. These guidelines provide a clear framework for recruiting, selecting, and onboarding employees, while also focusing on promoting internal talent development and succession planning. Centum is committed to fair and transparent recruitment practices, providing equal opportunities for all candidates and ensuring that the selection process aligns with the company's values of diversity, inclusion, and excellence. The policy also emphasizes the importance of aligning workforce capabilities with business needs, ensuring that Centum remains agile and competitive in a dynamic market.

The policies and procedures for employee recruitment and selection at Centum are established to facilitate the company's commitment to equal opportunity employment, hiring the best-suited applicants for available positions, making the best use of their abilities, providing job satisfaction, and ensuring that appropriate communications, records and Human Resources controls are maintained.

2.2 Policy Objectives and Guiding Principles

1. **Attract and Retain Talent**: Ensure the recruitment and retention of highly qualified and diverse employees who align with Centum's values and strategic objectives.
2. **Promote Equal Opportunity**: Foster an inclusive work environment by ensuring a fair and transparent recruitment process that provides equal opportunities for all candidates, regardless of background or identity.
3. **Support Business Growth**: Align workforce planning and recruitment efforts with Centum's evolving business needs, enabling the company to remain competitive and achieve its goals.
4. **Encourage Internal Mobility**: Promote the development and advancement of existing employees through training, career progression opportunities, and succession planning.
5. **Enhance Employee Engagement**: Ensure that the resourcing process contributes to high levels of employee engagement and satisfaction by selecting individuals who fit the company culture and values.
6. **Ensure Compliance**: Adhere to relevant labour laws, industry standards, and ethical practices throughout the recruitment and resourcing processes to maintain a compliant and accountable organization.

2.3 Human Resource Planning Procedures

Centum's Human Resource Planning Procedures are designed to ensure that the company effectively manages its workforce to meet both current and future business needs. These procedures outline the systematic approach to forecasting, acquiring, developing, and retaining talent, aligning human resources with the Group's strategic objectives. By anticipating workforce requirements, identifying skill gaps, and implementing effective development programs, Centum ensures that it maintains a capable, motivated, and engaged workforce. The planning process also supports optimal resource utilization, succession planning, and the ability

to adapt to changes in the business environment. These procedures shall regularly be reviewed to ensure they remain relevant and aligned with the company's evolving goals.

The HR Department will periodically undertake the following process:

1. Carry out an analysis of the company's business strategic plans in order to determine future activity levels and initiatives that will demand new skills
2. Determine the Human Resources requirements necessary to deliver the business strategy;
3. Forecast the future demand for Human Resources in terms of numbers and skills and assess the number of Human Resources likely to be available from within and outside the Organization;
4. Formulate a resourcing strategy that ensures that the Company acquires and/or develops the knowledge and skills necessary to achieve the Company's business strategy.

2.4 Responsibility

1. **The Group CEO**- provides the overall strategic direction for recruitment across the organization by ensuring that the process aligns with Centum's long-term goals, culture, and values. Additionally, the CEO oversees the organization's talent acquisition strategy, ensuring that recruitment efforts reflect the company's vision and goals for growth.
2. **Human Resources Manager**- working closely with the hiring managers, responsible for managing and overseeing the recruitment process and tracking recruitment metrics to improve future hiring processes. Also ensures that diversity and inclusion are prioritized throughout recruitment.
3. **Managing Directors- Subsidiaries**- responsible for approving recruitment decisions for senior positions within their subsidiaries and ensuring that the recruitment process aligns with both the subsidiary's and the Group's strategic objective
4. **Line Manager/Supervisor-** Working closely with the Group HRM, responsible for the recruitment process at the operational level. They also monitor new hires' performance and contribute to the retention of talent within their departments

Documents

Key reference documents include the Job Description, Human Resource System, and HR Policies and Procedures Manual (2025).

2.5 Determination of a Vacancy

The HoD will report on the availability of a vacancy in his Department to the Head of HR justifying the need to recruit. This should include vital information for the recruitment process, such as the title for the position, job description, the role specification, minimum qualifications, and the competency levels for the position.

Before the decision to recruit is made, the HoD will obtain approval from the Head of Business Unit and consult with the Head of HR on other options which might be appropriate, such as work re-design, re-assignment of existing employees, promotion and outsourcing of the service.

Once the decision to recruit is made, the relevant HoD together with the HR Manager/Head of HR will determine if the position should be outsourced, filled by a permanent employee, contract or a temporary one.

The HoD will complete an Employee Requisition Form **(Appendix 1)** and submit it to HR department for processing. Filing an Employee Requisition form will serve as a formal request to fill a vacancy.

2.6 Approval for Recruitment

The Group Human Resource Manager will approve all recruitment proposals. Where approval of recruitment is denied, the HoD will revisit the alternatives of re-design or re-assignment of existing employees.

2.7 Recruitment and Selection Process

The Company's recruitment policies and procedures are aimed at attracting the best available talent and to select solely on the basis of a candidate's suitability to meet the requirements of the position.

2.7.1 General Recruitment Procedure

The entire recruitment process shall be coordinated by the HR Department. All recruitment needs and appointments on behalf of the company shall be approved by the Human Resource Manager in consultation with the Group CEO, Subsidiary Managing Directors and the Board of Directors where necessary. In conformity with these provisions, the Executive Directors will be responsible for the recruitments of the Group CEO, Managing Directors, Heads of Department; and delegate the recruitment of the other cadres to a committee composed of the Human Resource Manager, HoD, immediate supervisor and/or a neutral HoD from another department as may be appropriate, in line with the best practices. In absence, suitable representatives will be approved by the Group HR Manager.

The level of the position being interviewed will guide the composition of the interview panel.

2.7.2 New Employee Requisition process

1. When a vacancy occurs, the HoD will notify the Head of HR of the fact in order to facilitate the commencement of a competitive recruitment process as described in this Policy.
2. A clearly defined job description and specification for each vacancy shall be prepared by the respective HoD in consultation with the Head of HR.
3. Applications for appointments to the vacant positions will be invited by way of advertisement in such a manner as the Head of HR may determine.
4. The Head of HR liaison with the HoD, will shortlist and invite the candidates for interviews.

2.7.3 Recruitment & Selection Best Practices

1. Prepare a shortlisting matrix for transparency and audit.
2. Adherence to EDI guidelines by ensuring gender, ethnic, and disability inclusivity and that female candidates get equal opportunities in leadership roles.
3. Use of Technology-Driven Hiring to improve efficiency.
4. Conducts psychometric and technical tests to ensure a skills-based hiring process.

2.7.4 Advertisement of the Position

The job opportunity shall be widely advertised to ensure fairness and inclusivity through various methods of sourcing of potential candidates to include but not limited to; newspapers, Headhunting, online job boards, Centum websites, Intranet and use of LinkedIn and other digital platforms. The advertisement shall clearly state; Job title and duties, Qualifications and experience required, Application procedure, Application deadline and Equal opportunity employer statement.

2.7.5 Interview Process and the Panel

The interview process is designed to ensure a fair, transparent, and structured approach to evaluating candidates for positions within the organization. The process is intended to assess candidates' qualifications, skills, experience, and cultural fit, while providing a platform for candidates to learn more about Centum and its values.

An interview panel shall be formed comprising of; Group HRM or Head of HR (for subsidiaries), HoD from department the position is being recruited for and representatives from other departments as may be guided by the HRM. This ensures that diverse perspectives are considered in the decision-making process. By following this standardized approach, we aim to identify the best talent, ensuring alignment with Centum's strategic goals and fostering a positive candidate experience and a well-rounded evaluation process.

2.8 Selection Process

It is the policy of Centum to seek and employ individuals who possess the necessary skills, competencies and experience needed to perform in a job, or who can be trained to perform tasks in a manner that will contribute to the effectiveness and objectives of the Company.

2.8.1 Assessment

Depending on the role, candidates may be asked to complete assessments that test technical skills, problem-solving abilities, and behavioral competencies. These assessments help us gauge a candidate's ability to perform in the role and align with Centum's standards of excellence.

2.8.2 Background Check

As part of Centum's selection process, a thorough background check is conducted to verify the information provided by candidates and ensure their suitability for the role. This step is essential for confirming the accuracy of a candidate's qualifications, employment history, and any potential criminal record, as well as assessing their overall reliability and integrity.

Background checks may include reference checks from previous employers, academic qualifications verification, and criminal background screening while complying with relevant privacy and data protection regulations. This process helps mitigate risks, ensures that the company hires trustworthy and qualified individuals, and contributes to maintaining a safe and

secure working environment. Before carrying out a back a written consent shall be obtained from the candidate in line with Data Protection Policy.

2.8.3 Final Authority to Hire

The Group HR Manager in Consultation with the Group CEO and/or Managing Director where applicable shall approve all appointments within the organization on the recommendation of the interviewing panel.

2.8.4 Offer and Appointment

Successful candidates will receive a formal offer, outlining the terms of employment. Once the offer is accepted, the onboarding process begins, ensuring the new hire has the resources and support they need to succeed in their role at Centum. The choice of selection tools will be discussed between the recruiting department and the HRM/Head of HR for subsidiaries.

After approval to appoint, both successful and unsuccessful applicants will be notified in writing by the HR Personnel within 14 working Days.

Any offer of appointment not accepted within the period indicated, or as shall be agreed, shall stand withdrawn and the next qualified candidate may be considered for the position. Otherwise, a repeat recruitment process may be carried out. The appointment of an employee shall take effect from the date on which he assumes his duty.

2.9 Onboarding

Appointment and confirmation of successful candidates shall be subject to evidence of possession of appropriate credentials and satisfactory references from at least the last two former employers.

A new employee joining Centum will be issued with an employment contract specifying the type of appointment and terms of service under which they have been appointed. The appointed employee shall also be given a copy of the HR Manual.

The successful candidate (s) will sign the offer letter/employment contract to signify their acceptance by acknowledgement of confirmation that they have consented the offer letter/employment contract.

2.9.1 Contractual Documents

Employees will be required to provide copies of necessary documents as shall be guided by the HRM/Head of HR for subsidiaries. Original documents must be presented for verification and will be returned immediately.

An employee who knowingly gives false information to enable him secure employment within Centum shall render such appointment invalid and the Company may institute legal action against him.

2.9.2 Employment Categories

All appointments shall fall under any of the following contact terms;

1. **Permanent** – an employment term whereby the contract with the company runs for an undefined period up to normal retirement or unless otherwise terminated. This employee is eligible for all employee benefits given by Centum that he qualifies for.

2. **Fixed Term**– an employment term whereby the contract with the company is for a fixed period to cope with variations in workload as well as to alleviate personnel difficulties which may arise from time to time.

   Based on business requirements, a fresh contract shall be issued for a new period but subject to payment of all terminal dues and the employee having availed himself all leave that was earned before expiry of the contract.

   All contracts will require approval from the respective HoD, Head of HR and **Group HR Director.** The job profile must be attached to the Employee Requisition form.

3. **Casual** – a person whose terms of engagement provide for his payment at the end of each day and who is not engaged for a longer period than twenty-four (24) hours at a time.
4. **Graduate Trainee** – refers to fresh graduates employed under the Centum annual graduate recruitment program which runs for a period of one (1) year. On successful completion of the program, the candidates will be assimilated into the business.
5. **Internship** – refers to opportunities Centum will provide to students who as part of their educational programs are required to gain practical work experience. The interns will be assigned to the relevant departments as part of their internship for a specified period.
6. **Secondees -** persons seconded to Centum with the aim of utilizing their knowledge and skills for a specific period of time or need for specific expertise.

2.10 Employee orientation and induction

Employee orientation will be coordinated by the HR Department. The HRM/Head of HR and the HoD will be responsible for the orientation and induction of new employees. The orientation program will be conducted within a month of the new employee joining Centum employment, to familiarize the employee with Centum, its policies and procedures as well as help in the integration into the organization effectively.

Refer to detailed induction policy guidelines Sect 3.0 below

2.11 Probation Period

The probationary period for new employees will be 3-6 months; depending on the intricacies of the role;

1. During the probationary period, staff will be eligible for Centum's medical cover and group personal accident cover.
2. The employment period will be calculated from the date of commencement of employment inclusive of the probationary period.
3. Appraisals shall be conducted and a performance appraisal report covering the probation period shall be prepared by the Line Manager with appropriate recommendations, at the last month of the probation period.
4. If the period of probation has been unsatisfactorily completed, it may be extended once for an additional period of up to 3 months in writing with consent of the employee.
5. If the period is extended, the individual's performance shall be reviewed again to determine whether or not performance has improved.

6. The holder of a probationary appointment who has completed the normal or extended period of probation satisfactorily shall be confirmed in the post. If his/her probationary service is unsatisfactory after the extended period, the appointment shall be terminated.
7. An employee on probation contract will be entitled to prorata leave as long as they have not completed 12 months full leave earning period.
8. Subject to the provisions of 6 above, a recommendation may be made at any time that a probationary appointment be terminated.

2.11.1 Termination during Probationary Period

The Company may terminate an employee during the probation period by giving at least seven (7) days' notice in writing as provided by law or payment in lieu of notice, unless the contract provides for a longer notice period.

2.11.2 Confirmation

An employee who has successfully completed his probationary period shall be confirmed into their substantive position. The Head of Business Unit shall make confirmation recommendations to the HRM in writing upon receipt of a satisfactory report from the Line Manager.

2.12 Employee Records

All staff data will be maintained and retained by the HR Office for reference in compliance with existing labor laws and confidentiality. Employees will be required to fill in the Personal Information Form **(Appendix 2)** which will guide them on the documents required by HR.

2.13 Employees Documents to be retained in the file

The HRM shall ensure that each new employee has a personal file. These files are confidential, and the HRM may share relevant information with line managers only upon a formal request and subject to approval.

Personnel files should contain all information relevant to the employee, and it is the responsibility of the HR to ensure that personal files are maintained and kept up to date.
Documents retained in the Employee file shall include but not limited to;

1. Approved employee requisition
2. Job Description
3. Curriculum vitae
4. Panellists Interview documents/Notes
5. Background/Reference Check records
6. Copy of ID – (Offer letter to be prepared as per full names on ID)
7. Induction Program
8. Signed employment contract
9. Personal Information Form
10. Next of Kin
11. Beneficiary Form
12. Copy of Pin certificate
13. Copy of NSSF
14. Copy of SHIF
15. Copy of academic certificates

16. Recommendation letters/ Certificate of service
17. Bank details – copy of ATM
18. 2 passport size photos (2 hard copies and 1 soft copy)
19. Certificate of good conduct
20. HELB clearance certificate/statement

During their employment, employees are required to immediately notify the Head of HR on any changes to their personal details (marital status, birth of new dependents and emergency contacts etc) for uploading and updating on the Human Resource Management System-People Hub.

2.14 Acting Appointment

Acting appointments arise when a position falls vacant, in which case the most senior and competent employee in the next lower cadre will be appointed to act. If there is a gap between the two cadres, the immediate occupied lower cadre shall be considered. Where the cadre is occupied by more than one employee, the most competent will be selected. Consideration will only be given when it is felt that the person in the lower cadre may be able to fit into the vacant position.

In all cases, acting appointments will be made in writing before the employee begins to act in the higher position. The recommendation will be made by the respective HoD in consultation with the Head of HR and approved by the Managing Director of the Business Unit/Subsidiary. For senior positions, recommendations will be made by the Managing Director in consultation with the Head of HR and approved by the Group CEO and the Executive Directors.

No acting appointment on a substantive vacant position shall be in excess of one year, but a person appointed to act for six months may be added another six months if it is felt that he still needs more time to prove his capability. On completion of the acting period of either the first six months or one year, an employee may be confirmed into the position. However, should the acting employee fail to measure up to the duties of the higher post, such employee will revert back to his original position with the previous salary and benefits he had before being appointed to the acting position; and the vacant position will be advertised and filled competitively.

2.15 Employment of Relatives

It is the goal of Centum to avoid creating or perpetuating circumstances in which the possibility of favoritism, conflicts of interest or impairment of efficient operations may occur. Therefore, while relatives of employees may be hired, relatives may not work in a direct reporting relationship.

For purposes of this policy, relatives are defined as: parent, sibling, spouse, child, grandparent, or individual who has acquired such a relationship through marriage. Prospective employees must declare as to if their relative works at Centum.

Managers should exercise caution in hiring to ensure that a new employee is not placed in a direct reporting relationship with a relative as defined by this policy.

Should two employees in a reporting relationship become relatives, as defined in this policy, during their employment at Centum, the choice will be theirs as to which employee accepts a transfer into an available position suitable to his skill and experience. If, between the two employees, a decision cannot be made, the employee with the least seniority must transfer

into the next available position suitable to his skills and experience. Managers should liaise with the Head of HR for assistance in facilitating a transfer.

2.16 Re-employment

Pursuant to Centum's objective of employing quality staff, whenever the best employment decision may be the re-hiring of ex-employees, the following conditions will apply:

1. Centum will give employment consideration when staff openings occur to former employees who have performed satisfactorily, and who had voluntarily resigned or voluntarily retired, and who desire to return to work.
2. Each application will be considered on its own merit after a review of the applicant's record, the type of job available, and other relevant factors.
3. Before pursuing the recruitment and selection process with a former employee, the HR Director must liaise with the Group CEO for a review of the job opening and the former employee's record who will provide final authorization for re-employment after a review of the circumstances.
4. A former employee may be re-employed provided that the reasons for his separation from service are not incompatible with his re-appointment.
5. A re-employed employee shall be given the terms and conditions applicable at the time of re-employment, without regard to any period of prior service, provided the post is vacant.

2.17 Working Permits for Expatriate Employees

In Compliance with the Kenyan Citizens and Immigration Act, 2011, Centum shall ensure that expatriates/foreign employees obtain the work permits/resident permits/employment pass upon acceptance of offer. This is to ensure that these employees are able to stay and work legally in the country.

2.18 Employment of Individuals with Liabilities

Centum will not take up any responsibility on liability a new employee has with their previous employer for example a car loan, mortgage to mention but a few. Such employees will be required to manage their financial liabilities with their previous employer before joining the Company.

2.19 Equity, Diversity, And Inclusion (EDI)

2.19.1 Purpose

Centum is committed to fostering an inclusive workplace that values equity, diversity, and inclusion (EDI). This policy ensures that all employees, stakeholders, and partners are treated with fairness and respect, creating an environment where diverse perspectives drive innovation and business success.

2.19.2 Scope

This policy applies to all employees and stakeholders associated with Centum. It covers recruitment, career advancement, workplace culture, leadership, and external engagements.

2.19.3 EDI Key Principles

Centum's EDI policy is anchored on the following principles:

1. **Equity**- Providing fair access to opportunities and resources while addressing barriers that may hinder full participation.
2. **Diversity**- Recognizing and valuing differences in race, ethnicity, gender, age, disability, sexual orientation, socioeconomic background, and other unique characteristics.
3. **Inclusion**- Creating a culture where every individual feels valued, respected, and empowered to contribute fully.

2.19.4 Policy Statement

Centum commits to;

1. **Fair Recruitment and Selection**- Implementing unbiased hiring practices to attract and retain a diverse workforce.
2. **Equal Opportunity**- Ensuring merit-based career advancement and professional development for all employees.
3. **Inclusive Workplace Culture**-Promoting respect, collaboration, and zero tolerance for discrimination, harassment, or bias.
4. **Leadership Accountability**-Holding leaders responsible for fostering an inclusive workplace.
5. **Stakeholder Engagement**-Partnering with diverse suppliers and advocating for EDI in external relations.

2.19.5 Implementation & Responsibilities

1. **Leadership & Management**- Responsible for embedding EDI principles into business operations and decision-making.
2. **Human Resources**- Developing and monitoring policies, conducting training, and addressing EDI-related concerns.
3. **Employees**- Expected to uphold Centum's EDI values and report any violations.

2.19.6 Reporting & Compliance

Centum encourages reporting of any EDI violations through confidential mechanisms. All concerns will be investigated promptly, and corrective actions taken where necessary. Non-compliance may result in disciplinary action.

3 INDUCTION POLICY

3.1 Policy Statement

Centum recognizes that its people are fundamental to its success. To enable employees joining the team to become effective and efficient in their role as quickly as possible, it is essential that they receive a timely induction.

3.2 Policy Objective

Centum places critical importance on thorough induction procedures, whose objective is to ensure new employees feel welcome, valued and settled in their new role(s). This forms the basis from which staff can quickly get up to speed, perform their duties effectively and begin to make a contribution towards attainment of the organization's strategic goals.

3.3 Scope

This policy applies to;

1. All newly appointed team members; both on open ended and fixed term contract;
2. Existing members who have taken on a new role within the Group.

The Group HRM and respective HoD/HBU are responsible for the induction of new employees and to ensure that they receive from appropriate sources the relevant information and support that enable them to apply themselves to their job and fully contribute to the success of the Company.

3.4 Key Aspects of the Policy

The policy sets out how appropriate induction will be provided and encompasses several strands of induction:

1. Pre-arrival Induction
2. Organizational Induction
3. Job Induction
4. Induction sign-off

3.4.1 Pre-arrival Induction

Some induction information can be provided in advance of the start date once a candidate has accepted an offer of appointment. This will enable new employees to begin familiarization with the Company and the job. The pre-arrival induction information is in addition to that provided in the recruitment process.

At least one week prior to arrival of the new employee, the Head of HR shall sign off on an induction plan. This plan will include:

1. Details of the organizational induction including details of the training needs prior to commencement of the job
2. Details of the job induction plan
3. Details of the induction colleague or 'buddy' for the new staff.

3.4.2 Role of the 'Buddy'

The buddy will be required to;

1. Actively follow up with the new employee to ensure that they know their way around the office
2. Facilitate the induction sessions with the different departments
3. Guide the new employee on understanding basic office procedures

4. Entrenching centum DNA to the new employee
5. Take up the primary role of coaching the employee
6. Ensure that the induction checklist is signed off within agreed timelines

HR will communicate arrival of the new team member (s) at least 3 days prior to joining via an electronic introductory message.

3.4.3 Organizational Induction

The aim of organizational induction is to allow staff to orientate and understand the Company's strategy, business/departments and culture so that they can work comfortably and effectively.

The induction plan will be programmed to cover the following areas;

1. **Formal introductions**: this includes the introductions to the team and the different departments within the organization.
2. **Facilities induction**: Orientation around the office involves orientation of all working tools as well as the necessary resources around the office environment.
3. **Strategy, culture Induction- This** involves communication of strategic objectives and organization values
4. **Specialist Inductions**: This entails the departmental orientation which enables the
5. joiner to get a greater understanding of the business
6. **Competency building training sessions:** This includes basic training necessary to equip one to effectively carry out the functions of the job.

3.4.4 Job Induction

Induction into the job for which the individual has been employed is an essential part of the onboarding process and complements the probation process. Activities carried out during job induction may be used by managers to document an individual's performance during the probationary period.

Job induction enables the individual to:

1. Consolidate their understanding of the responsibilities of the role
2. Understand the expectations in the form of standards and goals, set with their line manager
3. Understand how their work performance will be monitored (including probation and performance review processes)
4. Discover the information and support that is available to them, including mentoring and key contacts
5. Highlight areas where training and development (mentoring, coaching, professional development) would be appropriate
6. Apply their skills and knowledge to performing the job and demonstrate that they successfully meet probation requirements

The specific activities within job induction will be dependent on the demands of the role, the skills and the knowledge that the individuals bring with them.

During the job induction, employees must be made aware of the probationary procedure and that records of induction activities will be used to support the probationary process.

Responsibility for job induction falls with the immediate supervisor although specific activities may be delegated at the manager's discretion or within departmental guidelines and practices.

It is good practice for employees and supervisors to retain records of completed induction activities.

3.4.5 Induction Sign-off

The Head of HR will hold a post induction interview, three (3) weeks after the new employee commenced work. The objective of this session is to;

1. Confirm that the induction objectives were achieved
2. Confirm sign off on job description and goals for the probation period.
3. Provide a formal setting for discussion of any issues that may have emerged.
4. Obtain feedback on the Induction process.

3.5 Responsibilities

There is a shared responsibility between individual employees, Supervisor and HR, for the development of team members, and this begins with ensuring that all new team members receive an appropriate induction.

3.5.1 HRM

1. Design and delivery of pre-arrival and organizational induction and evaluation of the impact and effectiveness of the induction program.
2. Information and guidance which represents "good practice" regarding the induction process – this will assist departments in their Inductions and help to promote consistency across the organization. This will take the form of
    a) sample documents, templates and checklists
    b) guidance on providing "induction colleagues" (buddies)
    c) Induction program
3. Information and guidance on planning and carrying out an effective job induction
4. Scheduling induction events from other support departments
5. Web-based and on-line materials which supplement or provide an alternative format for all of the induction strands

3.5.2 Heads of Department

1. Communicates the new employee's specific roles, responsibilities, and expectations for their performance in alignment with the department's goals.
2. Giving full support to adopting best practice Induction processes.

3.5.3 Supervisors

1. Ensure employees receive the appropriate job induction, including induction into the
2. Departmental practices, work environment – this may be delegated to an "induction colleague" or another member of staff.
3. Allocating time for induction activities
4. Enabling new employees to be proactive in conducting their own induction
5. Maintaining induction records which support the probation procedure.

3.5.4 New employee

1. Identifying and undertaking, in a timely fashion, all the induction activities which are indicated to them by their supervisors.
2. Applying knowledge and skills gained through Induction to performing their job.
3. Maintaining induction records as part of their personal and professional development

3.6 Induction and Orientation Procedures for New Employees

The Head of HR will ensure that all preliminary arrangements of the arrival, facilities and orientation for the new employee including a detailed orientation program are ready before the reporting date. In conjunction with the Line Manager, they shall:

1. Oversee the orientation of the new employee and ensure that the employee settles on the job
2. Select a **buddy** that will help the new staff settle in and familiarize themselves with the new work environment
3. Brief the new employee on Centum's nature of operations and core objectives and the employee's specific role in them;
4. Introduce the new employee to other employees and others with whom the employee will interface;
5. Show the employee around the facilities and how to use various self-operated equipment; and
6. Coordinate all administrative arrangements required for the jobholder to effectively fit into and perform in the role. Such arrangements should include provision of office space and a computer, where applicable.

To ensure that all pertinent steps are covered in the induction process, the Head of HR has developed an Induction Checklist Form **(Appendix 3)**, which is issued to all new employees on their first day at Centum. The induction checklist contains all the tasks highlighted in this policy to be ticked off by the new employee as each milestone is achieved. At the end of the probation period, this induction checklist is submitted to the Head of HR as confirmation that the induction process has been successfully completed.

3.7 Induction Timelines

The induction program including training orientation, is structured to run for a period of not more than two weeks.

3.8 Quality Assurance

This will be addressed by:

1. Gathering evaluation and feedback data
2. Alignment to the probation process
3. Provision of guidance and support which represents "good practice".

4 ACCEPTABLE ETHICAL CONDUCT

4.1 Policy statement

This policy sets out the standards of behavior that is expected to guide employees in maintaining the ethical standards that help protect and enhance the company's reputation. It applies to all employees of Centum.

4.2 Policy objective

Centum's professional and staff conduct exists to ensure that employee's actions are directed by honesty and integrity towards the achievement of the company's goals and objectives.

4.3 Guiding Principles

1. Employees are expected to display professionalism and unquestionable personal integrity always, whether during or outside normal working hours.
2. The standard of personal conduct by employees should stand up to scrutiny with respect to the degree of professionalism, courtesy and quality of management.

4.4 Business Practice

Employees will be expected to have knowledge of the common business practices and to uphold the values of Centum. The company will conduct business according to the highest ethical and legal standards and employees will be expected to adhere to basic ethical principles. By accepting appointment, employees pledge to discharge their functions and to regulate their conduct accordingly.

Employees shall neither seek nor accept instructions from any external entity except as authorized by Centum. All employees at Centum have a right to be treated with respect in the workplace and Centum will endeavor always to provide an atmosphere that supports productivity, personal growth, dignity and self-esteem of every employee.

Employees shall extend courtesy and respect to all guests, visitors and the employees of other companies with which Centum collaborates or conducts business.

4.5 Ethical conduct

A shared code of ethics among all employees strengthens the overall quality of the Centum family. Employment by Centum carries with it a responsibility to be constantly aware of the importance of ethical conduct. Employees must never accept gifts, gratuities or rewards from customers for any service that they perform in their job. Employees must refrain from taking part in, or exerting influence in any transaction in which their own interest may conflict with the best interests of the company. Employees are not permitted to approach or negotiate with Centum's customers under any circumstance, which would in any way result in personal gain for the employee. Any breach of acceptable ethical conduct will be subject to disciplinary action as highlighted in part 9 of this manual.

4.6 Conflict of Interest

The company recognises and respects the individual employee's rights in activities outside his employment that are private in nature and do not in any way conflict with or reflect poorly on the company. Management reserves the right, however, to determine when an employee's activities represent a conflict with the company's interests and to take whatever action is necessary to resolve the situation, including terminating the employee.

During the continuance of the Employee's employment contract with Centum and for a period of three months following termination of the Contract, the Employee shall not be engaged, concerned or interested directly or indirectly in any business trade or occupation which competes or conflicts with or is likely or intended to compete or conflict with the business of the Company in any other business, trade or occupation either alone or jointly with or as a director, manager, agent, consultant or partner or employee of any person firm company or other corporate body. In case of doubt, clarity and or clearance should be sought from the respective supervisor, Human Resource office or the Company's Managing Director.

All employees must be sensitive to any activities, interests or relationships that might interfere with, or even appear to interfere with, one's ability to act in the best interests of the company and its customers. The following are some of the areas in which real or perceived conflicts of interest may arise:

1. Simultaneous employment by another company, particularly if the other organisation is a competitor or supplier;
2. Carrying on company business with an organisation in which the employee or a close relative of the employee has a substantial ownership or interest;
3. Holding a substantial interest in, or participating in the management of an organisation to which Centum makes sales or from which it makes purchases;
4. Borrowing money from customers or other than recognised loan institutions, from which Centum buys services, materials, equipment or supplies;
5. Employees should not accept gifts and hospitality amounting to more than 50USD.
6. Use or disclosure of any information without proper and specific authority unless there is a legal or professional duty to do so; and
7. Using one's position in the company or knowledge for personal gain.

Employment by the company carries with it a responsibility to be constantly aware of the importance of ethical conduct. Employees must refrain from taking part in, or exerting influence in any transaction in which their own interests may conflict with the best interests of the company.
Any employee found to be engaging in activities which may give rise to a conflict of interest will be subject to disciplinary action as highlighted in **Section 9** of this manual.

4.7 Personal Conduct

The official language for Centum is English. Employees shall conduct themselves in a manner that promotes co-operation, mutual understanding and fosters good relations with clients and colleagues. Your conduct should be of such a nature so as to enhance Centum's image. It is important that you create a positive and favourable impression with colleagues, clients and all stakeholders. This can be achieved by a professional appearance and by being courteous, tactful and punctual.

4.8 Substance Abuse

In order to meet our responsibilities to employees, customers and investors, we must maintain a healthy and productive work environment. Misusing controlled substances or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs or alcohol on the job is prohibited. Investigations may be conducted on employees found misusing controlled substances, drugs or alcohol. Centum will endeavor to provide rehabilitation and counseling services where possible. However, repeat offences of the above mentioned may lead to summary dismissal.

4.9 Supervisor's Responsibility to Subordinates

Effective and sound leadership requires that you deal with your subordinates in a way that encourages them to get the job done in the safest, least expensive and most effective way and still achieve the quantity and quality of service we desire. To do this, you must be ever mindful of the importance of trying to meet the individual and personal needs of your subordinates on a daily basis.

Every supervisor at Centum must recognise his obligations to subordinates, as well as his responsibilities to them, in order to gain respect and cooperation from teams.
To achieve this goal, it is expected that as a supervisor one will ensure that:

1. Each employee has the opportunity to earn a fair day's pay for a fair day's work. The employee will have the opportunity to progress and advance according to his or her effort, ability and opportunity within the company;
2. The necessary steps are taken to ensure that each employee thoroughly understands their job duties and responsibilities. The employee must know how to perform these duties and have the incentive to constantly improve performance;
3. There is a clear understanding of Centum's policies and procedures well enough to
4. interpret them clearly;
5. Each worker knows how s/he performs on the job. Supervisors are to be liberal in giving praise and credit where due. The supervisor should ensure that each employee's skill and abilities are fully utilised;
6. There is consistency and fairness in all disciplinary actions with employees at all times.
7. Supervisors have the responsibility of communicating and conveying to the employees the plans, intentions and any concerns of the company from the senior management team.

4.10 Dress code

Centum believes that a proper dress code is essential in a business where developing customer respect and confidence is necessary for long-term growth and prosperity. As such, employees are expected to maintain a professional appearance at all times. On official duties and meetings, employees should wear formal dress code.

This is applicable throughout the week except on Fridays when smart casual clothing is permitted. The following attire is unacceptable:

1. Jeans, leggings, sandals, shorts, floral shirts, sneakers, hats and other head gear, Micro minis, any tight and flimsy tops;
2. Ladies should not wear tight body-hugging dresses or low plunging/chest baring outfits.

4.10.1 Enforcement of Dress Code

HoDs and supervisors are responsible for monitoring and enforcing this policy. The policy will be administered according to the following action steps:

1. If questionable attire is worn in the office, the respective HoD/ supervisor will hold a personal, private discussion with the employee to advise and counsel the employee regarding the inappropriateness of the attire.
2. If an obvious policy violation occurs, the HoD/supervisor will hold a private discussion with the employee and ask the employee to go home and change his attire immediately.
3. Repeated policy violations will result in disciplinary action, up to and including termination.

Employees should consult their supervisor and/or Head of HR when in doubt of the appropriate dress code.

4.10.2 Personal Grooming

All employees should maintain a clean and groomed appearance. Hairstyles, hair colour, beards, moustaches, sideburns and other appearance related items should present a neat and professional style. Cologne, perfume and aftershave should be subtle. The company expects every employee to ensure that his grooming is hygienic and professional and does not in any way offend other employees, customers or the public at large.

4.11 Uniformed Employees

Centum will provide uniforms to all employees required to work in uniform. All employees who are required to be in uniform must be in their complete uniforms at all times. An employee found using an old uniform after issuance of new uniforms, or an employee found working without their uniform, or one found to have disposed of his uniform (e.g. through sale or destruction) will be subjected to disciplinary process.

As brand ambassadors, employees in company uniform are discouraged from visiting pubs or smoking in public or any behaviour tendencies that may bring the company to disrepute while in uniform.

4.12 Publication of Articles and Approaches from the Press

Employees are encouraged to submit suitable articles to professional journals. All articles will require the Line Manager's as well as the approval of the Head of Investor Relations and Corporate Communications prior to submission to the publishers. In addition, if an employee is approached by the press to comment on the company or any client; this is prohibited and must be referred to the Head of Investor Relations and Corporate Communications.

4.13 Telephone usage

The telephone is an important public relations tool for the company. Our main contact with our customers and suppliers is through the telephone. More details on telephone usage may be obtained from the Administration manual and employees are encouraged to familiarize themselves with the provisions therein.

4.14 Electronic Mail

Centum's e-mail system is part of the business equipment and should be used for company purposes. This includes communicating with colleagues, customers, conducting research on relevant topics and obtaining useful information for Centum's business. Employees must conduct themselves honestly and appropriately on the internet and respect the copyrights,

software licensing rules, property rights, privacy and prerogatives of others, just as any other business dealings demand.

The company expressly reserves the right to access, retrieve, read and delete any communication that is created, received, or sent on the e-mail system to ensure compliance with this and other company policies.

4.15 Office Access

Access to the inner offices is restricted to staff and authorized visitors only. Employees must receive all their visitors from reception and may attend to them in the official meeting rooms or in personal offices as applicable. All Employees are required to wear their Identity cards during the Official working hours; both within and outside the work premises.

4.16 Employees Personal Effects

It is the responsibility of all employees to ensure safekeeping of their cash and personal effects on a day-to-day basis both at the company offices and client premises.
Cash and other valuables should not be left unattended except when locked in a secure cupboard or drawer and, in any event, should not be left overnight.

4.17 Security Policy and Procedure

To protect Centum's data, systems and applications against all threats, which could endanger their confidentiality and integrity, strict adherence to the ICT security policies and procedures is imperative for all employees.
Non-compliance will lead to disciplinary action as highlighted in section 9 of this manual.

4.18 Office Etiquette

Employees **must** conduct themselves in a respectful and courteous manner. Honesty and dignity is also a necessity in the work place. The management is strict on upholding common courtesy and the following **10 basic habits** should be adhered to;

1. Be Helpful and co-operative with your colleagues
2. Avoid use of abusive language.
3. Avoid shouting and or making negative remarks.
4. Always use courteous words like 'Thank you', 'please', 'sorry' and show appreciation for services extended to you
5. Always dress neatly and appropriately.
6. Avoid violating the Equal Opportunity for all provision
7. Always arrive early for meetings.
8. Do not keep visitors waiting and endeavor to return calls
9. Keep your work area tidy
10. Always mute your phone during meetings to avoid disruptions

4.19 Hospitality & Management of Meetings

Centum has implemented policies to govern employee conduct in the workplace.
The company has fully fitted board rooms and meeting spaces with state of the art equipment. The administrator maintains a centralized calendar with a view to ensuring all meetings are efficiently managed. It is therefore important for employees to issue timely notice, preferably 1 day in advance of meetings to enable proper planning.
The administration department ensures that visitors are properly served within agreeable timelines. Employees are however encouraged to ensure that visitors coming for meetings are not kept at the reception.

4.20 Breakout Area

Centum has provided a cafeteria with sitting space for employees to have snacks and meals and to interact. Employees are therefore prohibited from having snacks and meals at the comfort of their workstations to keep away the pests associated with left overs. Employees are encouraged to adhere to habits listed below;

1. No meals will be consumed from the workstations at any one time
2. ii. The designated cleaner will take charge of constant clean-up of the kitchen. Any leftover foods should be cleaned up immediately and particularly before close of business every day.
3. No used cups, cutlery or kitchenware should be left at the workstation

Employees who use the kitchen facilities should clear up the leftovers and dirty dishware immediately after they have had their meals. It is prudent to leave the area clean as found and to make it user friendly for the person after you.

4.21 Office Management

Every employee is responsible for maintaining a clean desk always and reducing the amount of paper work on the workstation to the barest minimum.

Important and confidential documents should be locked up during one's absence from their workstation. Each member of staff is responsible for the security of official information in their custody.

Waste paper containing company information should be shredded before throwing the same into the rubbish bins. It is the duty of every employee to ensure that the workstation is organized and presentable at all times.

4.22 Non- Disclosure of Confidential Information

The employee shall not at any time either during employment and after employment has terminated, divulge or communicate to any person or persons or any other third party any of the secrets or any other information of whatever nature which may be in the employees' possession or which the employee may have received or obtained in relation to the transactions of the Company in a manner which may injure or cause loss whether directly or indirectly to the company. This is in accordance with the Contracts in Restraint of Trade Act, Laws of Kenya and violation of the aforesaid may call for legal action by the Company.

4.23 Smoking

All Centum work stations are a NO smoking zone.

4.24 Hours of Work

All employees are expected to adhere to prescribed working hours unless they have made acceptable prior arrangements. Failure to do so may lead to disciplinary action being taken against the employee.

In general, hours of work will be as stated below unless otherwise stated in the employment contract; employees may be required to work outside these hours depending on the prevailing circumstances.

In some instances, employees may be required to work alternative shift patterns including night time and over the weekends. In this case, notice will be given to the employee of this working schedule.

The Centum working hours are;

1. Monday to Friday 8.00am to 5.30pm
2. There is a daily one-hour lunch break from 1.00pm to 2.00pm.

Employees who work over and above the weekly normal working hours provided will be entitled to overtime if approval is obtained beforehand from the immediate HoD. This also applies to those who work on their designated rest days and gazetted public holidays.
Employees who work past 8.30pm; with approval from the Supervisor will be provided with transport to their home(s).

4.25 Flexi hours

Flexible work arrangements including home and remote working arrangements are permissible from time to time whenever practical and at the discretion of the supervisor or HoD. Specific flexible working arrangements for nursing mothers are provided for under **Section 4.2.4.2** of this manual.

4.26 Place of Work

Employees' place of work will be as stated in the appointment letter or service agreement. However, occasionally, the Company may require an employee to visit or work in any of the Company's business units or areas of operations.

4.27 Transfers

The Company reserves the right from time to time to require employees to work in a different location or different Business Unit located in a different location. If a permanent transfer is required, you will be paid relocation/transfer allowance.

4.28 Punctuality

Centum places high value on employee attendance and punctuality as these affect quality of service, employee productivity, morale and ability to meet goals, standards, and deadlines hence efficient operation of the company.

It is the responsibility of the employee to be at their work station at the scheduled starting time and to return from lunch break not later than the allotted time.

Occasionally unavoidable circumstances may cause the employee to be late, in which case, employees must notify their supervisor/HoD of the impending late reporting.

4.29 Absence from Work

Absence from work must be authorized in advance and in writing by the employee's Immediate supervisor/HoD.

In case of an accident or sudden illness that requires hospitalisation or an emergency relating to the employee or his immediate family member, employees should notify their immediate supervisor/HoD immediately or have someone notify their immediate supervisor; not later than 48 hours after the emergency has occurred.

In the absence of the immediate supervisor/HoD, the Head of HR should be informed of the absence.

It is the responsibility of the HoD to monitor and control the level of absenteeism in his Department.

Failure to notify immediate supervisor or HoD of absence from duty will require justification and may be considered a gross misconduct.

Where an employee, without leave or other lawful cause, absents him/herself from the work premises or other place proper and appointed for the performance of his work, Centum shall deduct an amount not exceeding one day's wages in respect of each working day for the whole of the period of absenteeism.

Where problems of lateness and absenteeism persist, the Head of HR will take corrective action through counselling, training and/or instituting disciplinary process.

4.30 Company Property

All employees are expected to take good care of Company property (working tools) that have been availed to them to enable them to discharge their duties effectively.

In case of loss of Company property, the employee will be required to pay the depreciated cost of the item.

5 LEAVE

5.1 Policy Statement

It is the policy of Centum to grant employees leave to recuperate and renew their energies in order to improve efficiency. Every employee has a right of taking leave with full pay within the calendar year. Leave is however subject to exigencies of duty.

5.2 Categories of Leave

For the purpose of administration of this policy, leave will normally fall under the following categories: -

1. Annual leave
2. Compassionate leave
3. Study leave
4. Unpaid leave
5. Sick leave
6. Maternity leave
7. Paternity leave
8. Sabbatical leave
9. Wedding leave

5.2.1 Annual leave

We recognize the importance of work-life balance and encourage our employees to take time off to rest, recharge, and maintain their well-being. As part of our commitment to fostering a healthy and productive work environment, all employees are entitled to annual leave in accordance with company guidelines and applicable laws. This leave provides an opportunity for personal time away from work to ensure long-term success and satisfaction both professionally and personally.
Centum Group permanent are entitled to 24 Annual Leave Days while the contracted one are entitled to 21 Days.

Employees shall be entitled to paid annual leave (***1st January – 31st December for Nabo Capital and Barium Capital, and 1st April – 31st March the following year for the rest of the wholly owned subsidiaries***) as stipulated in their contracts of employment subject to exigencies of duties.

The following principles will be followed in the administration of annual leave:

1. Annual leave shall be on working days basis
2. In all circumstances, all leave entitlements for any year must be taken in full.
3. Deferral or accumulation of leave will not be allowed. However, where exigency of duty does not allow an employee to fully utilize his annual leave, such employee may be allowed to carry over a maximum of 5 leave days to the next year. Such leave shall be utilized within the first six months of the ensuing year. Carryover of leave to the next year must be authorized by the employee's immediate supervisor and HoD in writing.
4. Where an employee has worked for less than 12 months in any leave earning period, they shall be granted a prorated entitlement to such leave. Pro-rate of the monthly entitlement will apply where an employee works for less than a month.

5. To avoid disruption of work schedules, each HoD will be required to prepare leave plans by 30th January/April of every year and submit copies to the Head of HR for administration purposes.
6. Employees are required to apply for leave through People Hub (the Company's Human Resource Information Management System); approvals must be obtained from the Line Manager and HR through People Hub and the Employee must not proceed on leave before the required approvals. Leave applications must be made at least 5 days in advance prior to the date requested, except in cases of emergencies.
7. Centum recognizes the importance of annual leave sustaining productivity by giving employees time to rest, "recharge batteries" and get some balance. As such, employees are encouraged to take uninterrupted annual leave of at least two (2) consecutive week's annual leave.
8. Leave once approved should be taken in its entirety. However, if the exigencies of duties so require, and provided in an agreement between the employee and the Company, an employee who has been granted leave may be recalled to duty before its expiry, the unspent leave will in such a case be reclaimed when the exigencies of duties so allow.
9. Failure to return to work on expiry of any agreed leave of absence will be treated as absconding duty and will result in disciplinary action that may include summary dismissal.
10. In the event of an employee's appointment being terminated by the Company, or in the event of an employee resigning his appointment, any balance of leave entitlement shall be commuted to cash and paid together with terminal dues. Otherwise, the company shall not pay cash in lieu of leave not taken.
11. If an employee has taken leave days in excess of their entitlement up to the last day of employment, then a deduction will be made from the final dues to recover the un entitled leave days

5.2.2 Compassionate leave

An employee will be granted compassionate leave, also known as emergency leave under exceptional circumstances to attend to personal matters pertaining to bereavement of an immediate family member as follows:

1. Immediate family members (Spouse, child, parent, sibling)	10 working days
2. Employee's father/ mother -in-law	5 working days
3. Employee's grand- parents	2 working days

Compassionate leave on hospitalization will only apply for spouse and child.

The maximum compassionate leave days is 10 working days per annum and once an employee exhausts this leave.

For other bereavements (persons other than immediate family members), employees may utilize part of their annual leave entitlement.

When an employee is unable to report on duty due to loss of a family member (as above) s/he must notify their superior within twenty-four (24) hours.

Where an employee requires compassionate leave more than the allowed maximum, this may be granted and deducted from the annual leave if not yet enjoyed or as leave without pay, at the discretion of the Company.

5.2.3 Study Leave

Centum's philosophy is to develop its employees and the company endeavours to strike a reasonable balance between allowing time off for job-related study/exams and the necessary time at work. Therefore, the company will grant study leave if the following conditions are met:

1. The course undertaken by the employee must be directly related to their job specifications in order that both the employee and the company benefits from the study.
2. The employee is entitled up to seven (7) working days study leave per calendar year on condition that it will not disrupt the employee's normal duties or the smooth workflow of the Department
3. The study leave must be approved by the immediate supervisor/HoD prior to commencement of the course and Head of HR informed for tracking purposes. An exam timetable will be required prior to approval of study leave.
4. Study Leave will not be granted for repeated courses or re-examinations.
5. Study Leave shall not be recovered from the employee's annual leave neither will it be accumulated or carried forward to the subsequent leave year.
6. Should additional exam leave be required, an employee will use their annual leave days, or unpaid leave days.

5.2.4 Maternity Leave

Female employees shall be entitled to three (3) months maternity leave with full pay. This will be exclusive of the normal annual leave and will be taken separately. A female employee will be entitled to her annual leave days due for the year.

Female employees are encouraged to submit their application for maternity to their supervisor within a reasonable period to allow for planning purposes.

During the period when a female employee is on maternity leave, her normal benefits and entitlements, including her rights to seniority or advancement and the accumulation of pension rights, shall continue uninterrupted in the way they would have continued had she not gone on such leave, and her period of service shall not be considered as having been interrupted, reduced or broken by the exercise of her right to maternity leave in terms of this policy.

Where an employee requires more time before or after childbirth over and above the stipulated entitlement and having exhausted their annual leave, she may apply for unpaid leave and this shall only be granted after such leave is approved by their respective supervisor/HoD.

Where an employee proceeds on maternity leave and the pregnancy results into a still birth, such a case will be treated as sick leave.

5.2.5 Pre-natal Checks and Post-Natal Clinic

An employee shall have the right to time off to attend pre-natal clinics. Approval for the same must be provided by the supervisor and proof of clinic attendance submitted to the Head of HR.

5.2.6 Provision for Nursing

During the 12 months period following the birth of the baby, the lactating mother shall be granted an additional hour per day for nursing. Approval must be obtained from the supervisor.

5.2.7 Paternity Leave

A male employee shall be entitled to two weeks paternity leave with full pay. Paternity leave will commence upon release of an employee from work subsequent to presentation of birth notification certificate. Such paternity leave shall be taken immediately after the child's birth and must be taken continuously. In case of an employee with more than one wife, he will be entitled to paternity leave only in respect of the wife registered in HR records maintained in HR and such leave shall be taken not more than once per year.

Except in cases of unforeseen emergencies, maternity or paternity leave will be applied for following the same procedures as the normal leave

5.2.8 Sick Leave

If an employee falls sick and is unable to attend to his duties, he will report to his immediate supervisor or arrange the immediate supervisor to be informed within 24 hours. The employee will have to produce a doctor's certificate giving details of his absence from duty.

If the medical doctor considers extension of the period of absence, it shall be the employee's responsibility to arrange for submission of further report to his immediate supervisor and Head of HR.

If an employee fails to submit a medical certificate, he will be treated as being absent from duty and will be subject to disciplinary procedures.

An employee who is absent from duty owing to illness not caused by his own neglect or misconduct, and who has complied with the provisions above, will be eligible for sick leave as follows:

1. An employee who due to sickness is absent from duty will receive his full gross salary for 30 consecutive days. After 30 consecutive days' absence, he shall be placed on seventy five percent (75%) of his gross salary for a further period of 60 days. After 90 consecutive days' absence, he shall again be placed on sixty percent (60%) of his gross salary for only a further period of 90 days. The maximum sick leave permitted per year is 180 days. A doctor's certificate must be obtained qualifying the employee to proceed on sick leave.
2. Where an employee is unable to report for duty after exhausting his sick leave, Centum shall only terminate his employment after obtaining a medical report from a qualified medical practitioner with explicit recommendation for termination on medical grounds. However, in the event that the sick employee's doctor recommends otherwise, parties may resort to a medical board to assess and give a final opinion on whether or not the said employee should be terminated on medical grounds. Before an employee is terminated on medical grounds, they will be given an oral hearing in the presence of the employee's employee of choice.
3. An employee, who has been involved in occupational accident, shall be entitled to sick leave period of 12 months of half pay upon presentation of a duly executed certificate of incapacity from the treating medical practitioner.
4. In all cases, the allowed period of sickness with full or half gross salary will be an interval of one year.
5. Other key provisions:
    a) A maximum of one (1) day taken due to illness of a child will be considered as part of sick leave.

b) Sick leave, which is not approved, will either be deducted from annual leave or salary.
c) Sick leave will not be accumulated from one year to the other year. There will be no provision to carry forward the sick leave not taken to the following year.
d) Sick leave will be cumulative from ***1st January – 31st December for Nabo Capital***
e) ***and Barium Capital, and 1st April – 31st March the following year for the rest of the wholly owned subsidiaries***). All sick leave taken at different times of the year will be added up to determine the amount of sick leave taken in any one year
f) Staff who fall ill during their annual leave and are granted sick off must notify their supervisor immediately for planning purposes.

5.2.9 Sabbatical Leave/ Unpaid Leave

Centum aims to accommodate the individual needs of its employees where possible and may grant unpaid leave for personal circumstances that require absence from work outside of those circumstances covered by the other leave entitlements.

Sabbatical leave will be granted only under exceptional circumstances and will be at the discretion of the Line Manager, Head of HR and respective Business Unit Head.

5.2.9.1 Eligibility

Sabbatical leave will apply to employees whose employment is on permanent basis and have served the company for a period of at least two years as long as granting of leave does not unduly compromise the needs of the business.

1. Sabbatical leave will be granted for a period of not more than three (3) months.
2. Employees must utilize all the accrued leave days before commencing on sabbatical leave.
3. During Sabbatical leave, all cash benefits applicable to the employee will cease. The company will pay all contractual obligations to the employee before commencement of sabbatical leave. However, the employees will be retained on group life and WIBA for the period they will be away. Employees will be required to handover all the Company property before proceeding on sabbatical leave.

5.2.9.2 Application & Approval Process

The Employee will apply for sabbatical leave through their respective Line Manager and will be required to complete the sabbatical leave application form.

Sabbatical leave will be approved by the Line Manager, Head of respective Business Unit and the Head of HR. Sabbatical Leave for all Heads of Functions and Directors will require approval from the Group CEO.

5.2.9.3 Resignation during Sabbatical Leave

Should an employee resign during the sabbatical leave period, they will be required to return to work effective the date of resignation to formally commence the handover process.

5.2.10 Wedding Leave

In addition to annual leave, Centum will grant employees wedding leave as follows;

1. Own wedding 5 working days
2. Wedding of parent or child by birth 2 working days

5.2.11 Return from Leave

It is the responsibility of an employee granted leave to return to duty on the due date. Disciplinary action will be taken against any employee who overstays his leave without sufficient justification.

5.2.12 Leave Encashment

As a matter of policy encashment of leave is not permitted, except at the point of separation provided that computation of leave accrued and not taken up to the date of separation shall be based on the prevailing employees pay.

5.2.13 Carryover of Leave

Employees are encouraged to take annual leave for at least two (2) uninterrupted working weeks during the twelve consecutive months of service. The remainder of the annual leave with pay shall be taken in the first six (6) months of the new leave earning period.

5.3 Handing Over for Leave

An employee proceeding on leave shall hand over his roles and responsibilities to his immediate supervisor and designated acting employee to ensure continuity of the department's operations during the absence of the employee. The following procedure shall be followed;

1. The employee applies for leave notifying the immediate supervisor/HoD of his intention to proceed on leave.
2. The Supervisor identifies a colleague to handle the work of the employee proceeding on leave.
3. The employee then prepares brief handing over notes indicating all pending assignments and action(s) to be taken.
4. The supervisor oversees the handing over process and ensures that it is done well.
5. Upon return from leave, the employee will receive an update from his colleague who was handling his work and handing over will be done to the employee and confirmed by the supervisor.

5.4 Public Holidays

Centum will observe official public holidays as shall be declared by the Government of Kenya.

If a public holiday falls on a Sunday, the following Monday will be observed as a holiday. Due to the nature of Centum's operations, an employee may be required to work on a gazetted public holiday. As part of planning of work schedules, the immediate supervisor must give at least one (1) weeks' notice to employees required to work on a gazetted public holiday. Affected employees will be entitled to out of pocket allowance. A copy of the schedule shall be submitted to the Head of HR.

If a public holiday falls on a day(s) during the employee's annual leave, the leave days will be extended by a similar number of days.

5.5 Religious Holidays

Centum respects the religious beliefs of its employees and will accept the absence of employees on recognised religious holidays, such as the following:

1. Christmas and Easter;
2. Eid-Ul-fitr;
3. Diwali;
4. Hindu New Year; and
5. Eid-Ul-Adha.

Centum further recognises there may be additional religious holidays other than those designated that an employee would like to observe. Formal requests to observe such events must be made to the Head of HR and the immediate supervisor for approval.

6 PERFORMANCE MANAGEMENT

6.1 Policy Statement

Centum recognises that in order to achieve organizational effectiveness and to effectively deliver on its mandate, it must pursue a management policy that enables it to establish a high-performance culture in its employees.

This is a culture in which individuals and teams take responsibility for their individual and overall Company performance.

In pursuit of this policy, the Company will implement a Performance Management System which ensures that employees' performance supports the Company's strategic aims. This will involve an integrated process that consolidates goal setting, performance review, talent reviews, and succession planning performance rewards and sanctions; and development.

6.2 Guiding Principles

Employees want direction, freedom to do their work and encouragement, not control.
The performance management system is a collaboration system between the employee and their immediate supervisor – the system will involve coaching, counselling, feedback and recognition and will encourage development.

The Performance Management System provides Centum with a formal and defined methodology for:

1. Setting objectives and targets at the beginning of each financial year;
2. Assessing the performance of the employee in terms of what they have achieved against set objectives in the financial year during the quarterly appraisals;
3. Outlining the objectives and key performance areas for the next performance review period;
4. Documenting the learning and development needs that will support the employee in the achievement of their objectives for the next performance cycle;
5. Enhance the communication relationship between the employee and supervisor;
6. Provide a basis for determining salary reviews, promotions, transfers, and termination of employment;
7. Focus the employee on enhancing performance and job enrichment;
8. Providing a consistent approach to manage poor performance across the Company;
9. Ensuring appropriate support is identified and put in place to improve the employee performance that falls below the required standards;
10. Ensuring corrective action is initiated by way of a Performance Improvement Plan
11. (PIP) as soon as poor performance is identified;
12. Ensuring that appropriate action is taken where the performance of an employee consistently falls short of the required standards.

6.3 Documents

The key reference documents include the performance management guidance documents (includes the goal setting & career planning form and performance appraisal forms), the reward and remuneration policy and the competency dictionary.

6.4 Scope of Application

The Performance Management System will be applicable to all employees of Centum as per the performance calendar.

6.5 Sequence of Performance Management System Activities

6.5.1 Performance Agreement

Performance Goal setting (Performance contracts) will define expectations or the results to be achieved and the competencies required to attain them. The agreements will cover the following:

1. Objectives and standards of performance
2. Results to be achieved defined as targets and standards
3. Performance measures and indicators

Performance agreements will be developed and executed at the beginning of each financial year. Performance planning involves the process of defining, discussing and arriving at an agreement between Supervisor and Jobholder on specific performance objectives that the Jobholder is expected to achieve by the end of a given planning period.

6.5.2 Managing performance throughout the year

In line with good management practices, performance management will be a continuous process that will involve setting direction, monitoring and measuring performance and taking action accordingly.

The process of managing performance requires that the Line Manager regularly monitors the jobholder's progress to proactively identify opportunities for re-enforcing positive achievements and/or behaviours, and for taking necessary prompt actions or seeking intervention to correct emerging performance gaps and/or inappropriate behaviours.

6.5.3 Performance review process

1. Goals for the year shall be set in April and end year appraisal sessions will be conducted in April the following year. For Nabo Capital, Goals for the new year shall be set in January and end year appraisals shall be conducted in December.
2. The review shall be conducted on a quarterly, semi-annually and on an annual basis.
3. Every employee's performance shall be reviewed by their performance manager. The
4. Group CEO's performance shall be reviewed by the Board.
5. The appraisee shall countersign the completed appraisal form. Where the appraisee is not content with their appraisal, they shall have the right to appeal.
6. The appraisal will be conducted in accordance with the appraisal procedures and form. The performance management guidance documents are attached as **Appendix 5** of this manual.

6.6 Goal Setting

Goal setting is the first step in performance management. Goals need to reflect the key business priorities for the coming year. They are how an individual will contribute to the results of both the department/team and Centum. As a guide, they should be three (3) to six (6) goals that cover the outcomes and deliverables required. Goals should be mutually agreed on between the employee and their supervisor by end April each year or by the close of induction for new employees.

The framework for these goals within Centum is highlighted below:

6.6.1 Quantitative

Quantitative goals are standards for performance that are quantifiable. They are not task lists or a job description of what is required day-to-day but a reflection of the specific contribution of individuals to the organisational objectives within the period

1. **Return goals** - these refer to goals concerning shareholders, investee companies, potential businesses and how the individual will contribute to achieving Centum's returns on investment targets.
2. **Activity goals**
    a) Investment Activity goals - these refer to goals involving the investment process as well as all others that will immediately or in the long run impact on return.
    b) Shared services Activity goals - these involve objectives such as customer service delivery, advisory, as well as cost management initiatives.
3. **Risk management/Compliance goals** - these involve setting goals that ensure individuals contribute towards managing risk & enhancing the control environment within Centum.

6.6.2 Qualitative

Qualitative goals are the behaviour characteristics necessary for successful performance on the qualitative goals. They are the standards of behaviour.

Centum has established a competency frame work that clearly describes the 8 behavioural characteristics that are needed for success in any role across Centum. These competencies are further described in the **competency dictionary.**

The eight competencies underpin performance management, career planning and personal development.

Each competency has four proficiency levels for the various levels of leadership at Centum.

No	Leadership Level	Proficiency level	Description
1	Level 1	Leading Self	*Is an effective member of the team with sound technical skills and works collaboratively to deliver a high standard of work under minimal supervision;*
2	Level 2	Leading Others	*Is an effective team leader with sound technical proficiency skills who develops and equips other team members to deliver on the department's objectives;*
3	Level 3	Leading a Department	*Is a competent and capable leader who can effectively manage resources whilst developing the teams' capabilities to drive the department's objectives;*
4	Level 4	Leading a Business Unit	*Is an Industry expert who provides Business Unit leadership through clear development and communication of the strategy whilst developing leaders within the team;*
5	Level 5	Leading an Enterprise	*Is a highly networked and respected business leader who provides vision and direction to multiple businesses across the Group;*

The 8 competencies include;

1. Executes Entrepreneurially
2. Thinks Strategically
3. Acts Commercially
4. Drives & Owns Business Results
5. Leads Change and Innovates
6. Develops Self, Team(s) and Leaders
7. Collaborates and Influences
8. Demonstrates Resilience

Reference is made to the Competency dictionary (**Appendix 6**)

6.7 Personal Development Plan

Personal development plans address both current development needs and those skills that will be useful for future career progression.

An effective personal development plan will be guided by the following;

1. Identification of set objectives and learning needs to meet the requirements
2. An open and transparent approach on development- based on developmental needs identified in the workplace
3. Personal responsibility and proactive follow through on individual development
4. A comprehensive training and development plan that effectively addresses the development needs of the employee
5. The personal development plan will be drawn from the annual review process and goal setting session. Constant follow through/monitoring by the supervisor throughout the performance review process is critical in ensuring achievement of the plan.

6.8 Training

The Company looks to create a culture of learning throughout the organisation where individuals take responsibility in partnering with Centum for their development and attainment of their maximum potential.

The training policy is established to provide an opportunity for all employees to obtain learning and development to increase their competence in their present jobs and to prepare for possible advancement in the future. It is also intended to ensure the company of a reasonable return on the investment made in the development of our staff.
The policy guiding learning and development at Centum is found in **Section 6** of this manual.

6.9 Performance Review

6.9.1 The Review Calendar

The performance review sessions will be conducted in line with the appraisal calendar. A standard performance management system has been adopted to track performance throughout the year.

The strategic objectives will be communicated at the beginning of the year and departmental goals set. Individual objectives are set based on the departmental goals.

Organizational goal setting will be conducted in March each year. End year reviews will be conducted in April every year and quarterly review sessions will follow in June, September, December and the final end of year review session in April.

6.9.2 Confirmation Reviews

All new employees will be expected to have review sessions prior to confirmation.
The goals set upon joining should be measurable and achievable within the stipulated probation period.

6.9.3 Project Reviews

Interim review on performance against projects will be dependent on the completion dates for these projects. This may not necessarily follow the performance calendar, but performance will be factored in the annual review. Project goals are set prior to embarking on the projects.

6.10 Preparation for Review Sessions

6.10.1 Role of the Appraisee

1. To ensure full participation in the appraisal process
2. Conduct a self-assessment of performance during the period
3. Complete the appraisal documents citing evidence of accomplishments and challenges and the rating on performance
4. Ensure that the appraisal document reflects the goals set during the period
5. Provide the appraisal documents to the supervisor at least 3 days in advance to enable a meaningful review session

6.10.2 Role of the Appraiser

1. Schedule the appraisal session with the appraisee in advance, preferably 1 week to enable an objective discussion
2. Take time to review the performance appraisal form
3. Schedule the appraisal session
4. Provide objective feedback on achievements and developmental needs
5. Ensure that the appraisal documents are filed and the appraisee receives a copy for reference

6.11 Levels of Performance

The performance levels against goals within Centum are highlighted below.

	Rating		Definition	Scores
1	Above Target	E	This applies where the employee consistently performs above the required standards and exhibits superior qualities than required of the position Exceptional is the key word and any performance rating at this level must speak for itself from an impact perspective.	=>125%
2	On target	OT	The employee demonstrates a level of accomplishment that fulfils the required standards. Achievement of the required goals from a time, quality and completion perspective.	100%-124%
3	Below target	BT	The employee demonstrates as level of performance that is below standard. Achievement of less than 100% of the required goals from a time, quality and completion perspective. Put differently; the agreed quality and timeframe were not met whether the goal was completed or not.	0%-99%

6.11.1 Linking Performance to Reward

Performance bonus eligibility is dependent on both Corporate and individual performance. Individual participation in the bonus pool is based on the overall performance appraisal.

Part 8 of the manual provides details of the performance bonus scheme

6.11.2 Talent & Performance Committee

The Talent & performance Committee comprising of the Executive Committee is responsible for the following;

1. Cascading of strategic objectives into annual corporate goals and departmental goals. This is done in March of each year prior to the commencement of the new FY.
2. Reviewing performance of team members formally once a year in June with a view to moderating performance reviews for consistency where necessary
3. Talent management- identify top talent and implement effective succession plans

6.11.3 Role of the HR

The role of the HR in performance management is to:

1. Provide advice and clarification in facilitating the process;
2. Provide training on the system for existing and new employees;
3. Provide guidelines and documentation and updates on the systems;
4. Review disputes and provide counselling as and when necessary;
5. Ensure that the performance management system is in line with the overall strategy, vision and Centum's culture;
6. Prepare reports on the results and maintain appropriate records and performance statistics; and
7. Use the information from the performance system to allocate performance pay notches.

6.12 Performance Improvement Plan

We are dedicated to fostering a culture of growth and excellence. The Performance Improvement Plan (PIP) is a structured and supportive process designed to assist employees in meeting performance expectations and achieving their full potential. When an employee's performance falls below established standards, the PIP provides clear goals, specific timelines, and the necessary resources to facilitate improvement. Our aim is to work collaboratively with employees to address performance gaps and ensure continued success, while reinforcing Centum's commitment to development, feedback, and long-term success for both individuals and the organization.

The main objective of this section is to:

1. Ensure that, where an employee's performance has not attained the required standards, appropriate steps are taken to enable the employee to reach the performance standard required, and;
2. Provide fair and effective arrangements for dealing with under performance.

6.12.1 Definition of Under Performance

Under performance occurs when an employee performs below the required standards in the set objectives and in the overall job role.

6.12.2 Identifying the Under Performer

Under performance will normally be identified by line management when carrying out performance assessment.

The line manager/supervisor is responsible for:

1. Identifying under performance through performance assessment;
2. Handling under performance effectively and in a fair and professional manner;
3. Ensuring that employees are aware of the policies and procedures for dealing with under performance;

The HR function is responsible for undertaking the following:

1. Providing technical and professional advice, guidance and support to line management and staff; and
2. Coordinating the tracking of under performers to ensure that appropriate action is taken by the Line Manager.

6.12.3 Procedure for Performance Improvement Plan

6.12.3.1 First Performance Review

As soon as an employee's performance is causing concern, the supervisor/manager should discuss the situation with the employee and identify and agree on the problem, establish the contributory factors and agree on a course of action. A specific and target based action plan (including training, counselling, etc.) should be agreed which will define the extent of the improvement required and confirmation of the date of the next performance review. The second review should be undertaken at the end of a period of two (2) months.

6.12.3.2 Second Performance Review

The supervisor or manager should review with the employee the performance in light of the previously agreed action plan. Should the required performance improvement not have been achieved, the employee in question will be advised that if the required improvement in performance does not materialise by the next review, termination of employment will take place.
However, the supervisor or manager should analyse whether the particular employee has any strengths and determine whether it is possible to re-deploy the staff to another department before this decision is made. A further targeted action plan should be agreed and a date determined for a follow up review. The third review should be at the end of a period of three (3) months.

If it is concluded that the employee will not succeed in reaching the standard required, it should be recommended to the reviewer's superior that the employee's employment be terminated on grounds of continued poor performance.

6.12.3.3 Termination of Employment

The termination of an employee, who has consistently performed below the required standard, should be considered carefully. Due diligence and professionalism should be properly exercised before discontinuing an individual's employment.

If a member of staff who had previously been an under performer reaches a satisfactory level of performance, it will be advised in writing that no further action will be taken regarding a possible termination of employment on this occasion.

7 LEARNING AND DEVELOPMENT

7.1 Policy Statement

Centum recognizes the need to develop its people so that they are fully equipped to deliver its current and future business objectives. Learning and development is an integral part of Centum's commitment to attract, motivate and retain talented employees in the company. Centum's policy is to develop its staff to ensure that they have the requisite skills, competencies and knowledge to manage and grow the business through self- learning, facilitative and practical training interventions that add value, are cost effective and address the needs of both the individual and the business at large.

Centum's learning and development plans are therefore designed to deliver the requisite changes in practice and behaviour to support on-going and future business strategy and operations.

7.2 Policy Objectives

The overall objective of the Learning & Development Policy is to ensure that learning and development activities are aligned with the objectives of the Company. Specific objectives are:

1. To ensure that the Company has employees with the appropriate knowledge, skills and competencies to meet its business objectives in both the short and long term.
2. To allow our employees to achieve their potential and career aspirations both within the Centum and the wider community.
3. Prepare staff for career development and succession
4. Ensure that learning and development activities are implemented in a structured and objective manner
5. To build a more efficient, effective and highly motivated team, which enhances
6. the Company's competitive position and improves employee morale
7. To promote the use of the full range of development opportunities, ensuring that where a formal course is chosen it is the most appropriate solution

7.3 Guiding Principles

1. Equality of opportunity for all in all aspects regarding employee learning & development
2. The policy will be aligned to the performance management program framework through clear and measurable objectives for employee performance at work
3. Learning should be encouraged only where there is measurable benefit to the organization and the employees' current jobs and aligned to their career growth
4. Learning and talent development is an investment for growth of the Company
5. Learning is a key ingredient to individual career development and talent retention and should be supported by all
6. Learning and development will be subject to availability of funds

7.4 Scope of the Policy

The Learning and development policy is applicable to all employees of Centum.

7.5 Responsibilities

7.5.1 Role of Centum

The company through the senior management will be responsible for actively encouraging learning and development as a means to enable Centum meet its business objectives and providing the opportunities and infrastructure for learning and development to take place.

7.5.2 Role of Employee

1. Learning and development is most effective when each individual takes responsibility for his or her own learning. This includes taking an active role in planning one's own personal development, undertaking agreed development activities, and evaluating the effectiveness of these. Maintaining a learning log helps employees recognize what they have learned and how they applied the outcomes of training and development activity in their work.
2. Where employees confirm attendance to scheduled trainings sponsored by the company and subsequently fail to attend, without ample due notice prior to start date of training course, the entire cost of the training program will be transferred to the employee.

7.5.3 Role of Supervisor/Performance Manager

1. The primary role is to identify training needs and request for training arrangements by HR Department, while their Secondary role is to advise their staff on self- development.
2. To mentor and coach staff while also acting as role models in all departmental issues, to identify specific performance gaps that hold back staff performance/ efficiency, plan (by drawing programs) and provide training to their specific staff either themselves, or through other means/facilitators.
3. To work with the employee in evaluating his or her own training needs through the performance and development review process.

7.5.4 Role of HRM

The HR function has a facilitation role in relation to training and development. This includes:

1. Provide the tools to support training and development (i.e. the performance review process, training and development logs).
2. Advise and encourage individuals and those with line management responsibilities about training and development matters and provide support to the Heads of Department through the design, delivery, internal and external sourcing of development solutions
3. Coordinate the delivery of certain training and development activities that are organized centrally and ensure that recommended training and development programs meet the overall Company business objectives and are followed through
4. Manage the centralized budget for training and development and ensuring consistency of allocation
5. Maintain records with regards to the development of all staff
6. Prepare organisation wide training need analysis and an annual training plan.
7. Periodically review Training and Development Policy and make recommendations to the Ex-Co for appropriate action.
8. The Head of Human Resources will also have a secondary role in identifying training needs at the corporate level and providing guidance on priorities to ensure that training objectives are aligned to corporate strategy.

9. Advice staff on self-development.
10. Play a secondary role in identification of employee's training needs
11. Coordinate the employees career plans and Human Resource development efforts.

7.6 Identification of Training Needs

Development needs may be identified at several levels: those that apply to the organisation, those at a group or team level and those which apply to a particular individual (or group of individuals). Mechanisms are in place to identify training and development needs at each of these and collectively these are summarized in the training and development plan.

Training Needs Analysis shall be undertaken annually based on:

1. Corporate strategic plan
2. Skills inventory
3. Performance review
4. Career Progression Plans
5. Projected Human Resource needs
6. Routine training needs surveys
7. Emerging issues that are core to Centum

7.7 Determination of Training Needs

7.7.1 Organizational wide Training and Development Objectives

These are identified by HR in consultation with senior management. This involves analyzing the strategic objectives and taking account of external and internal influences that may affect the organization's performance.

7.7.2 Group/Entity Training Needs

These are identified following a meeting between the respective entity leadership/BU head.

7.7.3 Team Level Training Needs

Information is gathered from a variety of sources to identify training and development needs at team level. As above, responsibility for this lies with HR and performance managers, in consultation with senior management. Sources of information used for this purpose are likely to include:

1. The performance review process documentation
2. Discussions with Performance managers and staff – both formal and informal,
3. Findings from the annual staff survey
4. Team plans with regard to existing local priorities

7.7.4 Individual Training Needs

At the level of individuals, the performance review process is the main vehicle for recognizing and planning training and development. Performance managers are responsible for ensuring that individuals training needs are followed through.

7.8 Learning and Development Plan

The Head of HR will prepare a detailed and costed training and development plan at the beginning of every FY once all performance review documentation has been received and analyzed. This will summarize the development needs identified at Organisation wide level, for particular groups or teams, and for individuals, based on the variety of information sources set

out above. The training and development plan will be submitted to the Talent and Performance Committee for approval.

7.9 Resources for Training and Development

7.9.1 Budget for Training and Development

The budget for training and development is managed by the Head of Human Resources and is based on information, discussion and agreement with Business Leaders/Managing Directors of various subsidiaries as well as the Finance Department along with organization, group and individual training needs.

7.9.2 Time allocation for Training and Development

Training and development activities required will usually take place during work time and agreed/approved costs will be borne by Centum or reimbursed. Where training and development takes place in normal work hours, cover will be arranged where necessary.

Training and development activities that are encouraged by Centum but not essential may take place during work time, or may involve study in the participant's own time, during evenings and weekends.

7.10 Methods of Training

7.10.1 Induction/Orientation

Induction training is aimed at assisting and ensuring that employees have the initial skills and knowledge required to perform on the job.

This involves introducing a new employee to the organization and its procedures, rules and regulations. Every new employee needs to be made familiar with his job, his superiors and subordinates and with the rules and regulations of the Organization. It is short and informative and given immediately after recruitment. This training takes a few days and involves presentation sessions and Interaction with representatives from various departments/entities.

The primary reason for orientation programs is that the sooner employees know basic information related to their job, the sooner they can become productive. It also reduces their nervousness and uncertainty and leads to more satisfaction so they are less likely to quit. Orientation training is used to develop a positive attitude in employees. The time spent conducting a session shows that the organization values the new employees.

7.10.2 Technical Training

These are programmes aimed at developing and maintaining the skills required for performance of employees in their particular part of the business.
Technical training can be:

1. Basic Job training – aimed at increasing the knowledge and skills of an employee for improving performance on the job.
2. Developmental training - Involves training of existing employees to enable them perform higher levels in new jobs. Employees with potential are selected and are given training before their promotion.
3. Refresher training/retraining - The purpose of this training is to acquaint the existing employees with the latest methods of performing their jobs and improve their efficiency

further i.e. to avoid personnel obsolescence. It is essential to relearn in order to keep pace with the technological changes in respective fields.

7.10.3 Behavioural Skills Training

These are programs implemented to develop the skills and confidence necessary to perform effectively in the role.

7.10.4 Management & Leadership Development

The Leadership Development Program is designed to equip selected employees with the necessary skills and behaviors to lead the organization in the short, medium and long term to meet its objectives.

7.10.5 Professional Qualification Programmes

Centum offers opportunities to achieve professional certification from institutes in specific functional areas to enhance employees' skills and expand their knowledge base. The focus is to "empower talent with learning."

7.11 Entitlement to Development Support

The extent to which a training and development activity can be supported by Centum will depend on a number of factors including:

1. The relevance of the development need to achieving the strategic objectives of the organisation
2. Availability of funds in the training and development budget
3. Hidden costs – including, for example, the amount of work time required to complete the development activity
4. Parity with similar applications.
5. The amount of development support that it is reasonable for any one member of staff to undertake in a given period

7.12 Qualification for Training

To qualify for training an employee should:

1. Have been recommended by the immediate supervisor for the course, which should
2. be relevant to the employee's current and prospective duties and responsibilities
3. Have shown interest, initiative and a stellar performance since employment; no pending disciplinary case; and should not be serving notice of termination of employment.
4. The employee must have a reasonable chance of completing the full course successfully.

7.13 Selection for Training

1. Staff will be selected based on the approved training needs analysis (TNA) and budget
2. Where an employee wishes to undertake a qualification, they should bring this to the attention of HR through their performance manager. This should be discussed as part of the performance review process and then the employee shall be required to complete an application stating how the qualification will benefit his department and the organization as a whole; as well as the cost of the training. He may also be asked to supply further details about the proposed development activity.
3. The qualification to be pursued must be relevant to the employee's work and future career path as identified by the company; and
4. A copy of the approved application must be forwarded to HR for inclusion in the appropriate personal file.

5. Unsuccessful candidates for training/sponsorship shall be informed of the outcome by HR Department through their performance manager
6. Staff trained for long courses will be expected to work and demonstrate the skills learned for a period of two years before being eligible for further/additional long-term training of more than two weeks so as to allow other employees to also benefit from similar opportunities.

7.14 Sponsorship for Longer Term Training

All regular, permanent staff will be eligible for longer term training provided their plan of study does not interfere with their work schedule. In addition, the eligible employees must have completed 2 years of continuous service before starting the course.

Courses eligible for reimbursement must be offered by an accredited university, college, or business, trade, or technical school. The course must relate to a master's Degree programme or plan of study approved by the employee's immediate supervisor and the CEO. Degree programmes or plans of study must focus in your area of expertise or derived from your career growth plan in that completion of the same would qualify the employee for some position to which he could aspire within the company.

To apply for assistance, an employee must complete an initial letter of intent and obtain approval from his supervisor as well as CEO prior to registration of classes. Employees who take up Masters Classes will be eligible for a 50% reimbursement.

The reimbursement is subject to successful completion of the graduate program and Certification for the same and employees who qualify will be required prior to commencement of the course, to sign a service bond to work in the company for a period of two years or as shall be determined by management.

Should an employee leave employment during this period, they shall be required to reimburse the company for the period not served. Pro-rata fees will apply.

The employee is responsible for actual admission, enrolment fees, exams re-sit and exceptions fees.

7.15 Company Suggested Training

For training or education that has been suggested by the company, Centum will typically pay associated costs including training fess, transport, accommodation, meals and other incidental costs up front. Such training will typically be related to professional development.

7.16 Participation in Trade and Professional Associations

Employees are encouraged to apply for membership and take an active interest in trade and professional associations when eligible. The company will reimburse employees for membership fees or dues for trade and professional associations, subject to the prior approval or recommendation of management. Each approved membership is subject to an annual review by the Performance manager.

Employees are encouraged to submit articles, present papers, or give talks to trade and professional associations and their publications. However, prior approval must be obtained from management if any subject involves company confidential information or trade secrets and/or

if such communication might be constructed as representing the company's position on any subject.

Employees who are invited to seek or serve in any official position of a trade or professional association must obtain management approval before accepting the appointment. The company may, upon management approval reimburse employees for reasonable expenses incurred in attending to their duties and compensation for working time lost. Any absence from work duties requires management approval.

7.17 Professional Qualification and Membership Assistance

Centum encourages and supports employees to advance their knowledge by undertaking professional qualifications relevant to their careers within the Company. As such, all Centum employees are expected to remain relevant and up-to-date with their professional qualifications.

Membership and Annual Subscription will be paid for qualified employees to their professional bodies to enable them retain their qualifications and participate in continuous professional education in order to enhance their professionalism.

Qualifying employees must be members of at least one relevant professional body. Centum will pay in full for professional exams and memberships which are related to the employee's area of work including but not limited to;

1. Institute of Certified Public Accountants of Kenya (ICPAK)
2. Association of Chartered Certified Accountants (ACCA)
3. Marketing Society of Kenya (MSK)
4. Chartered Institute of Marketing (CIM)
5. Institute of Human Resource Management (IHRM)
6. Kenya Institute of Management (KIM)
7. Institute of Certified Public Secretaries of Kenya
8. Law Society of Kenya (LSK)
9. Kenya Institute of Supplies and Management (KISM)

The list may be reviewed by management from time to time based on new or emerging requirements.

Professional exams eligible for reimbursement or full payment must be offered by an accredited college, association or professional body.

The company will only pay for first attempts at professional exams which the employee is expected to pass. Should an employee fail the first attempt and is required to re-sit any exam, it will be his responsibility to meet the re-sit costs. If an employee opts not to sit for a professional exam fully paid for by the company for personal reasons (except emergency cases), and which fee amount is non-transferable for the next exam session, the employee is expected to reimburse the company the amounts paid in full. The employee is also expected to forward all exam results to HR for the record and filing purposes.

Employees are expected to provide their own textbooks if these are not included as part of the course fee.

7.18 Conditions for Funding of Educational Assistance/Professional Courses

7.18.1 Upon Resignation or Dismissal

If a member of staff leaves employment (through resignation or dismissal) during the study year or if they fail to complete the study or sit any required examinations within a reasonable timescale the employee will be required to refund Centum the full cost of the training fees.

7.18.2 Examination re-sits

If a member of staff fails exams that have been funded by Centum, they will be required to refund the Company and pay for the subsequent re-sits.

7.18.3 Updates

Employees are expected to update their Performance Managers and Head of HR on their progress on a bi-annual basis and to notify them immediately of any issues affecting the potential completion of their study. A copy of certificates or confirmation of completion of each study year should be forwarded to the Head of HR for updating in the employee records.

7.19 Study/ Exam Leave

Employees may be permitted to take up to seven days paid leave for the purposes of study or exams in any year. Any additional time required must be taken as annual leave or unpaid leave.

An individual who wishes to take study leave should provide their Performance Manager and HR with details of the course for which they wish to study and his reasons for the application for study leave. Documentary evidence of examination dates or college workshops may be required.

In considering applications, the Performance Manager and Head of HR will need to be reassured that the group can make adequate alternative arrangements for office cover while the individual is away.

7.20 Monitoring

Individual members of staff should maintain records of development activities in which they have been involved. Learning logs should be completed after each training or development activity and then stored in a learning log file as the ideal method for keeping such records. The collated learning logs should be referred to during the performance review meeting. Learning logs should be attached to an application for training and development as a record of how previous development activity has been applied at work.

HR will maintain records of all learning and development activities.

7.21 Evaluation

Centum recognizes that learning and development of employees has a budgetary implication. There will therefore be a need to evaluate its impact on performance in order to establish the effectiveness from both an organizational and a personal perspective. This is done in two ways.

7.21.1 The Performance Review Process

This is the primary means of evaluating training and development. The individual and their Performance Manager should use the performance review meeting to evaluate the extent to which agreed development activities have achieved the intended objectives and, where necessary, plan the next steps. Unplanned development opportunities that arise in the course

of normal work activity should also be reflected upon in order to identify how this might improve future work activities.

Following the performance review meeting, a written summary of all the matters discussed should be produced and forwarded to HR, in accordance with the performance review process.

7.21.2 The Training and Development Evaluation Form

The purpose of these forms is to evaluate the effectiveness of training and development, and ensure that time and energy are wisely employed. An individual is asked to complete these immediately after and three months after each training/development event. A copy of this is forwarded to HR.
HR is responsible for analysing the performance review documentation and training and development evaluation forms regarding the effectiveness of training and development activity, and where necessary taking follow up action. The evaluation data will inform the HoD and Head of HR on future practice about advising staff on the training and development opportunities available to them and booking training courses.

Annually a brief report shall be produced by HR for the Talent and Performance Committee summarizing the impact of training and development on work performance and any relevant feedback from the staff survey.

7.22 Skills Inventory

Centum will maintain an up-to-date skills inventory of the employees. The Head of HR will be responsible for maintaining the skills inventory. The Inventory will be circulated annually to HoDs.

7.23 Career Development

The Company recognizes the need for career development and will encourage employees to improve their knowledge and working skills. The objective of career development will be to better equip them to serve the Company and build it to its potential. Career development will ensure an internal pool of skilled and competent employees for succession management.

The Company will provide staff with a conducive environment for personal advancement. Employees wishing to undertake training related to their jobs or are likely to add value to the Company may be considered for assistance.

Employees wishing to undertake other training not related to their scope of work may do so at their own expense.

7.24 Training Bond

Employees who benefit from the sponsorship of Kshs. 500,000 (Five hundred thousand Kenya shillings) and above shall be bonded for two years and a security offered by them as a condition for approval of the training. The reason for bonding is to ensure that the Company benefits from the skills and knowledge acquired by the employees while on sponsored training.

Commencement date of bonding will be date of completion of the course and the bonding period shall take precedence to the resignation period set forth in the Contract of Employment.

Failure to serve the bonding period will result to Centum recovering the cost of training which will be prorated by dividing it by 2 years (24 months) from the date of completion of the course

and only the balance of the months not worked will be recovered from the terminal dues, should an employee wish to leave before serving the two (2) years.

7.25 National Industrial Training Authority (NITA)

To complement the budgetary allocation for trainings, the HR team shall seek and obtain approval from NITA beforehand to facilitate reimbursement of the expenses incurred in any training.

7.26 Graduate Management Trainee Program

Centum has a Graduate Management Trainee Program that runs for a maximum period of one (1) year. The program targets graduates across various fields from both public and private Universities.

Once potential candidates are identified, each is posted to a business unit/Department. The respective HoD will assign a mentor who will be responsible for training and offering career guidance, progress review and evaluation of the MT. On a quarterly basis, the Mentor will provide progress report to the HoD who will discuss the same with HR with a view to ensuring the trainee is within the agreed training and development program and agreed performance objectives.

After one (1) year successful intensive training, and depending on available opportunities, the Graduate Trainee will be absorbed in the company. A Graduate Trainee Contract may also be terminated if in breach of Company policy, poor performance or as outlined in the company separation policy.

7.27 Internship

Centum engages interns for the purposes of them gaining practical exposure in their various areas of study. This is done during study from higher learning institutions.

Whereas Industrial Attachment Programme will be done in collaboration with National Industrial Training Authority (NITA) as a way of streamlining and coordinating the process, the Internship Programme will be wholly handled by the Human Resources Department.

The HR department will fill in NITA's attachment requisition form and submit it to NITA at least two (2) weeks prior to commencement of the attachment program. The selection of the students will then be done from the HR databank or the Industrial Attachment office at NITA in collaboration with the Universities/Colleges.

At the end of the attachment program, the Head of HR will fill in a NITA assessment form which will be used in claiming a grant of Kshs. 3,000 per month per attaché that NITA offers to employers paying their monthly levy as a way of promoting the program. The Company will, in turn, pay a token per month to the Inter

8 REMUNERATION AND REWARD ADMINISTRATION

8.1 Policy Statement

It is the policy of Centum to ensure employees are recognized and rewarded for their contribution in achieving the objectives of Centum.

8.2 Policy Objective

The overall objective of this policy is to enable Centum to;

1. Attract, motivate and retain a high caliber Human Resources;
2. Be competitive within the employment market
3. Improve organizational performance against agreed targets, including financial viability
4. Be fair and consistent in application of reward strategies

8.3 Scope

The policy is applicable to all Centum employees.

8.4 Guiding Principles

Centum's reward strategies aim to attract, motivate and retain employees at all levels to drive high a high-performance culture across the business. The reward strategies are closely linked to the Group's strategy and the achievement of corporate and individual performance objectives.

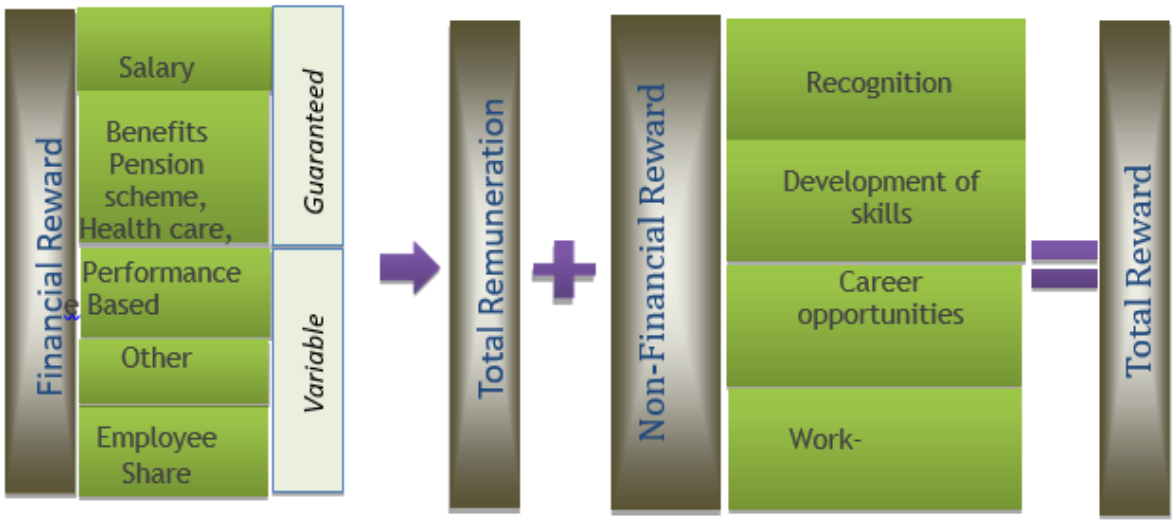
The reward strategy is founded on the following principles;

1. **Internal equity** – this is an important element of the remuneration strategy to ensure employees are rewarded appropriately in relation to each other, considering their unique performance, contribution and potential.
2. **External competitiveness -** this is key in attracting and retaining the best talent in the market. Centum's preferred position is to lead the local market and match the regional market regarding total rewards.

   The positioning is assessed annually through participation or subscription to appropriate industry and related surveys to ensure employees are competitively rewarded in line with the market.
3. **Alignment of the interests of employees with those of shareholders**– this is considered in structuring performance based/variable pay. They are also intended to promote tangible wealth creation and alignment, while discouraging short-term results at the expense of longer-term profitability and sustainability.
4. **Outperformance** - Remuneration practices and schemes are designed to encourage out-performance relative to strategic targets and comparable companies, while operating within the Group's financial targets.
5. **Attraction, motivation and retention** - All elements of reward determine the Group's ability to attract, retain and motivate both current and potential employees. The mix within this total reward concept varies from role to role based on function and in relation to the market.

Management believes the principle of total reward has been entrenched in the culture and values of the Group and that there is a strong and sustainable link between performance, contribution and potential on the one hand, and the reward received on the other.

8.5 Elements of Total Reward



8.6 Remuneration

The following factors are considered when determining remuneration.

1. Financial factors: Cost efficiency and a mix between variable and fixed costs is considered in determining remuneration structures
2. Competitive positioning in the market
3. Scarcity of skills and retention criteria
4. The grading structure evolved from job evaluation exercise

8.7 Salary

Salary is a reward for performance at accepted standards relative to responsibilities within the Group. The positioning of salary is dependent on the Group's grading structure which will be translated into a salary structure following benchmarking with the market.

8.7.1 Salary Structure

A salary structure is the relative salary ranges established for all jobs within an organization determined by the established grading structure. It essentially introduces salary ranges into the grading structure. Employees may obtain more details on how job evaluation results in a grading and salary structure may be obtained from HR Department.

8.7.2 Salaries Administration

An employee engaged by the Company will receive full pay from the date he reports for duty at the station stipulated in his letter of appointment, and as subsequently confirmed by his immediate supervisor.

Salaries will be paid monthly in arrears and will be set out in a pay slip.

An employee's salary shall be paid locally through his bank account in the appropriate currency. Any employee who changes his bank account shall immediately notify the HR department.

8.7.3 Salary Adjustments

Adjustments in salary are provided under the following conditions:

1. Improved responsibility without a change in job classification;
2. Confirmation after successful completion of probation;
3. Promotional increases are given in recognition of promotion from one job classification to a higher classification; and
4. Cost of living allowances that result from a review of prevailing economic conditions and that are applied to all employees.

8.8 Deductions

8.8.1 Statutory Deductions

Centum shall recover and remit all statutory deductions as provided for in the various Acts of Parliament; i.e. PAYE, SHIF, NSSF & AHL.

8.8.2 Other Deductions

Employees must request, in writing, any additional deductions from their salaries to meet financial obligations, e.g., SACCO contributions, loan repayments, etc which will be effected following a response letter from the HR department to the employee confirming authorization to make the deduction (s).

It is imperative upon all employees that they manage their financial affairs and plan their expenditure within their disposable income.

Whereas the company has no option but to undertake deductions in compliance with court orders or any other justifiable reasons, the employee shall be given a written notice on receipt of each order.

8.8.3 Salary Advances

Centum encourages all employees to exercise prudent management of personal finances and does not provide any salary advances.

8.8.4 Benefits and Allowances

Benefits and allowances offered to employees may vary from job grade to job grade. Any changes in benefits and allowances will be communicated in writing.

Below is a summary of the applicable benefits and allowances for Centum employees:

8.8.5 Medical Scheme

All Centum employees and their families are eligible to the company medical scheme for both in-patient and outpatient treatment.

Detailed information on the benefits of the medical scheme is provided in **Appendix 7** of this manual.

8.8.6 Pension Plan

Centum provides a defined contribution pension plan which is designed to provide income for all covered employees beyond the working years. To be eligible, an employee must have been

confirmed into permanent employment. Both Centum and the employee will each contribute 7.5% of the employee's monthly basic salary. Pension deductions will be from the date of confirmation and will not be back-dated.

Benefits are fully vested after 1 year of service, which means that after 1 year in the plan, the benefits accrued to the employee's account are assigned to the employee even if s/he leaves the company and may be claimed by him at retirement age.

Administration of the pension scheme is guided by the Kenyan Retirement Benefits Act. Changes to the Act that have an impact on the scheme are updated in **Appendix 8** and communicated to employees

8.8.7 Group Life Insurance

The company enrolls permanent employees in a group life assurance plan as soon they join the company, which provides the employee with benefits in the event of death or dismemberment. The present coverage provisions are highlighted in **Appendix 9.**

8.8.8 Group Personal Accident Cover

All Employees are provided with group personal accident coverage. The company pays the entire cost of this coverage which is based on 4 times the employee's annual earnings. Employees are covered by group personal accident if they are incapacitated by injury or illness arising out of their employment.

Other benefits include medical expenses, compensation for total or partial disability, and death benefits. Employees must report all accidents to their supervisor, regardless of how minor. If a work-related injury requires medical attention by a physician or any other medical facility that produces a bill, a claim must be made out that same day by the employee's supervisor. An original copy of the claim must be forwarded to the HR department who will forward it to the insurance company.

8.8.9 Acting Allowance

An acting allowance will be payable to employees who are appointed on a temporary basis, to undertake the duties of a more senior position. The acting allowance paid will be the difference between the acting employee's minimum salary band and minimum salary band for the grade of the senior position. The minimum acting period that will qualify for an acting allowance will be one (1) month and the maximum acting period will be six (6) months; which may be extended for a further six (6) months on mutual consent with the acting employee.

8.8.10 Travel Accident Insurance

Centum provides travel insurance for employees required to travel on company business.

8.8.11 Staff Health Club Membership

The Health Club benefit is applicable to all confirmed employees. Subscription to this facility is optional but is recommended as part of our wellness program
The facility is structured on a 50:50 cost share basis with Centum.

8.8.12 Social Club Membership

The Social Club membership is applicable to Directors only. The benefit is limited to entrance fees for one club only at a maximum of Kshs. 350,000 as well as annual subscriptions. Administration of this benefit is guided by the Company's payables procedures covered in the Administration and Finance manual.

8.8.13 Centum Loans Scheme

Centum has established loan schemes with Sidian Bank. The schemes cover mortgage, car and personal unsecured loans subject to pre-determined limits. The facility pricing is pegged on the fringe benefit tax rate and is aimed at ensuring that employees gain access to loans at a lower interest rate compared to the market. Only confirmed permanent employees who have served for six months are eligible to this benefit. Details of the prevailing terms and conditions of the facilities are highlighted under **Appendix 10.**

8.8.14 Work Injury Benefits Act (WIBA)

This benefit is catered for under Centum's Group Accident Cover which exceeds WIBA's current minimum limit. An updated register of employee earnings and prescribed of all employees is kept in HR custody and made available to the Director for Inspection.

In the event of disablement or death by accident attributable to the performance of official duties on behalf of Centum, an employee or his nominated beneficiary, shall receive compensation in accordance with the provisions of WIBA and the relevant insurance policies held by the company.

8.9 Performance Based Bonus/Profit Share Schemes

8.9.1 Group Performance Based Bonus Scheme

Centum's bonus policy is geared towards recognising employees whose performance exceeds the normal expectations and requirements for their positions. Company performance will determine whether a bonus will be paid or not in any particular financial year. Individual performance will determine the allocation of the bonus pool.

Basis

Centum staff will be entitled to an annual performance-based bonus pool subject to the company attaining total return as a percentage of **Company** opening shareholder funds of **15%** or more in the financial year in question.

The annual bonus pool will be 20% of the total return that is above target (15% of opening shareholder funds). Should total return exceed 25%, then the performance pool will be increased by 1%for each 1% above total return.

The above basis will be applicable to return from all Centum departments except the Real Estate and Infrastructure business line. The basis for computing bonus payments for the Real Estate & Infrastructure will be determined at the beginning of each project and will be based on agreed project milestones.

8.9.2 Eligibility

All employees as at March 31 of each year will be eligible to receive a discretionary bonus subject to the following terms and conditions;

1. An employee achieves an overall rating of 'On target rating' and above.
2. The employee is not on disciplinary or on PIP
3. Where an employee is on PIP on disciplinary, the employee shall forfeit the bonus entitlement for that year. However, the previous bonus will be unlocked should the employee successfully complete the PIP or disciplinary process
4. The employee is in employment when such bonus is paid
5. That at the point of payment of the bonus, the employee is not serving notice to resign or is not being separated from the company.

For employees who have not completed a full year of service bonus entitlement will be prorated for the period of service in the year. Employees shall be awarded bonus subject to organizational performance and individual employee contribution subject to performance targets.

8.9.3 Timing of Bonus Payment

When a bonus is due it will be set aside in a bonus pool and paid in the month following the month in which the Board approves the audited financial statements of the company for the financial year in question.

8.9.4 Vesting

The bonus entitlement for a year will be paid out to staff in three tranches over a period of three years. The vesting conditions are highlighted below.

1. Shareholder funds (NAV) will not fall below the level they were at the point of the bonus award (high water mark).
2. The high-water mark will be adjusted for owner related adjustments such as payment of dividends or new capital raisings etc.
3. An eligible employee must remain in the employ of the Company for the entire period unless a specific waiver is granted by the Board.

8.10 Other Rewards

Other than rewards highlighted above, one-off rewards will be awarded to staff for outstanding on-time achievements

8.11 Administration of the Reward System

The criteria for administering the award scheme are currently under development and will include the following elements.

1. Criteria for reward
2. Eligibility for reward
3. Identifying nominees
4. Recommending nominees to the Talent & Performance Committee
5. Types of reward
6. Timing of reward

8.12 Non- Financial Rewards

8.12.1 Development of Skills & Career Development

This is covered under the Leadership development policy and guidelines

9 WORK LIFE BALANCE

9.1 The Purpose

The Company understands that achieving a healthy balance between work and personal life is crucial to the overall well-being, productivity, and satisfaction of our employees. The aim of this policy is to promote a work environment that supports the mental, physical, and emotional health of employees while ensuring organizational goals are met. This policy outlines the guidelines and practices designed to help employees manage their work and personal life responsibilities effectively.

We are committed to supporting a balanced and flexible work environment where employees can thrive both professionally and personally. We believe that a well-rested, healthy, and happy employee is more engaged, productive, and innovative. We encourage all employees to take advantage of the resources and flexibility offered under this policy to maintain a healthy work-life balance.

9.2 Scope

This policy applies to all employees of Centum Group, across all departments and levels of the organization. It is intended to offer flexibility in work arrangements, time off, and employee support to help employees maintain a balance that works for both them and the company.

9.3 The Key Principles

1. We believe in offering flexible work options to accommodate employees' needs, recognizing that each person's work-life balance requirements are unique.
2. **Well-being**;- We prioritize employee well-being and encourage practices that help employees manage stress, prevent burnout, and maintain a healthy lifestyle.
3. **Respect for Personal Time**;- We recognize that employees have personal lives outside of work, and we are committed to respecting personal time and boundaries.

9.4 Work Arrangements

1. **Flexible Working Hours**; - Employees may request flexible working hours where feasible. This can include adjusting start and end times based on personal commitments, post maternity and paternity care cases among others provided it does not disrupt team collaboration or productivity.
2. **Remote Work**; -Centum Group offers remote work options for eligible positions, allowing employees to work from home or another location. Remote work arrangements can be requested on a regular or occasional basis and should be discussed with direct supervisors to ensure effective coordination.
3. **Compressed Workweek**; - Employees may request a compressed workweek arrangement (e.g., working four longer days instead of five standard days). Approval for this arrangement is subject to department needs and business requirements.

9.5 Paid Time Off (PTO) and Leave

1. **Annual Leave**;- Employees are encouraged to take their full annual leave entitlement to rest, recharge, and focus on personal interests or family commitments. Requests for annual leave should be submitted with adequate notice to allow for scheduling and coverage.
2. **Sick Leave;-** Centum Group provides sick leave to employees for health-related issues. Employees are encouraged to take the time they need to recover and avoid coming to work while ill.

3. **Personal Leave**; - Employees can request personal leave for important life events such as family emergencies, bereavement, or other personal matters.
4. **Public Holidays**; - Centum Group observes all statutory public holidays in the country where employees work, and these holidays are provided as time off.

9.6 Support for Employee Well-being

1. **Employee Assistance Program (EAP)**;- Centum Group offers an Employee Assistance Program to provide confidential counselling and support services for employees dealing with personal or work-related challenges.
2. **Health and Wellness Initiatives**; - We promote health and wellness through various programs, including fitness challenges, wellness workshops, and access to mental health resources. Employees are encouraged to participate and prioritize their physical and mental well-being.
3. **Stress Management**; - Employees are encouraged to take regular breaks throughout the workday to reduce stress, stay refreshed, and improve focus. We also support team-building activities that foster a positive work environment and reduce workplace stress.

9.7 Expectations for Work-Life Balance

1. **Respecting Boundaries**; - Employees are expected to manage their workloads within standard working hours. Managers should respect employees' personal time and avoid requesting work outside of regular hours, except in cases of urgent business needs, which should be communicated in advance.
2. **Workload Management**; - Managers are responsible for ensuring that workloads are manageable and that employees are not overwhelmed. Workload reviews should be conducted regularly to adjust and allocate resources as necessary.
3. **Communication**; - Open communication between employees and managers is essential in managing work-life balance. Employees should feel comfortable discussing their needs for flexible work arrangements, time off, or adjustments to their workload.

9.8 Parental Leave and Family Support

1. **Maternity and Paternity Leave**; -Centum Group offers paid maternity and paternity leave to support employees during the birth or adoption of a child. Employees are encouraged to take the necessary time off to bond with their child and adjust to new family responsibilities.
2. **Family Care Leave; -** Employees may request leave to care for a sick family member or attend to family emergencies. This leave can be taken on a case-by-case basis and is subject to approval.
3. **Flexible Schedules for Parents**; - Centum Group recognizes the challenges faced by working parents and offers flexible scheduling options for employees with children, allowing them to better manage work and family responsibilities.

9.9 Technology and Boundaries

1. **Limiting After-Hours Communication**;- we encourage employees to disconnect from work after hours. Managers and team members are advised to respect personal time by limiting emails, phone calls, and other work-related communication to within business hours, unless it is an urgent matter.
2. **Use of Technology**;- Employees should use work-related technology (email, messaging platforms, etc.) in a way that does not interfere with their personal life or well-being. Work devices should be used primarily for work purposes, and employees are encouraged to disconnect once their workday is complete.

9.10 Monitoring and Review

Centum regularly reviews its work-life balance initiatives and policies to ensure they are meeting the needs of employees and supporting a healthy work environment. Feedback from employees is encouraged and used to continuously improve work-life balance practices.

10 10.0 DISCIPLINE MANAGEMENT

10.1 Policy statement

Centum recognizes the importance of having a disciplined workforce that operates within the framework of its core values and culture. Its policy and procedure on disciplinary matters and performance at work is designed to safeguard and protect the interests of the individual, other employees, and the Company's reputation by providing a framework for management and employees to ensure that the high standards of job performance and conduct that are required, are met and maintained.

10.2 Policy Objective

The objective of the policy is to ensure fair treatment of employees who become liable to disciplinary action, institute discipline in the workplace and to correct unacceptable behaviour.

10.3 Nature of Offences and Gross Misconduct

An employee may be disciplined by the Company if he commits an offence listed under these regulations. The following offences are not intended to constitute a complete and exhaustive list of the prohibited employee conduct. Management may amend this list at any time.

10.3.1 Minor Offences

These are generally isolated acts of omission and become serious if repeated. It is the duty and responsibility of all supervisors and management to apply the terms of these regulations in disciplining those who commit the following minor offences:

1. Poor time keeping i.e. lateness in reporting to work or leaving work before time without any valid reason
2. Taking work time to deal with personal issues e.g. excessive use of internet chat, personal email and telephone calls
3. Inappropriate dressing as defined in the Code of Conduct and Ethics policy e.g. wearing forbidden attires, unkempt hair, nails, un-ironed attires etc.
4. Smoking within unauthorized areas - offices/building
5. Idling and loitering during working hours within and outside the offices f) Avoiding work on account of feigning sickness
6. Causing unnecessary commotion in the Company premises or client premises or in public places
7. Failure to wear uniform (applies to Uniformed employees)
8. Failure to meet work deadlines

10.3.2 Gross Misconduct

Gross Misconduct is an offense which may result in summary dismissal of an employee for lawful cause without notice or less notice as stipulated in Section 44 of Employment Act Laws of Kenya.

Any of the following matters may amount to gross misconduct so as to justify the summary dismissal of an employee for lawful cause, if: -

1. Without leave or other lawful cause, an employee absents himself from the place appointed for the performance of his work;
2. During working hours, by becoming or being intoxicated, an employee renders himself unwilling or incapable to perform his work properly;
3. An employee willfully neglects to perform any work which it was his duty to perform, or if he carelessly and improperly performs any work which from its nature it was his duty, under his contract, to have performed carefully and properly;

4. An employee uses abusive or insulting language, or behaves in a manner insulting, to his employer or to a person placed in authority over him by his employer or to a fellow employee;
5. An employee knowingly fails, or refuses, to obey a lawful and proper command which it was within the scope of his duty to obey, issued by his employer or a person placed in authority over him by his employer.
6. In the lawful exercise of any power of arrest given by or under any written law, an
7. Employee is arrested for a cognizable offence punishable by imprisonment and is not within fourteen days either released on bail or on bond or otherwise lawfully set at liberty;
8. Committing, or on reasonable and sufficient grounds is suspected of having committed a criminal offence against or to the substantial detriment of his employer's property

10.3.3 Disciplinary Procedures

The Company is charged with an important duty, and its commitment must remain satisfactory and efficient service to customers. Such service is not possible without self- disciplined staff, of exemplary conduct and integrity. In this respect, every employee shall abide by the provisions of these regulations, and particularly as amplified in this section.

Depending on the seriousness of the offence committed, it will be incumbent upon all persons in the Company charged with the responsibility of supervising the work of others, to familiarize themselves with the due process of disciplining employees who commit offences. In this regard, all such cases shall be treated fairly and justly, and the employee given a fair hearing to respond to charges brought against him.

The following approach shall be adapted when dealing with cases of indiscipline:

10.3.4 Conduct a Preliminary Investigation

The investigation is meant to establish the cause of unsatisfactory conduct. When an employee is reported to have committed an offence in terms of the provisions of these regulations, his immediate supervisor shall institute an investigation, taking into account whether the employee is a habitual offender or a first offender, or whether there were extenuating circumstances that occasioned the commission of such an offence. In all cases the supervisor shall desist from taking a hasty action not based on the true facts of the case.

10.3.5 Suspension

An employee may be suspended from the place of work for a period not exceeding three (3) months with half pay. Suspension is considered where an employee is under investigation. Once investigations are over, the affected employee will be notified of the outcome that could lead to a caution, final warning, termination, dismissal or any other disciplinary action as a consequence of a disciplinary hearing. Where an employee is found innocent, all withheld salary and benefits will be reimbursed in full. The suspension may be extended in writing if the investigations are not concluded and reason for the extension is justified.

10.3.6 Conduct a Discussion/Counselling Session for Repeat Minor Offence

A discussion session does establish the reasons behind the undesirable behavior in question. The supervisor's main objective of the discussion with the employee who has breached the rules is to help him improve on the noted undesirable conduct or meeting the established job standards. The supervisor shall in such cases refrain completely from use of abusive, scolding, or intemperate language. If the discussion/counselling is not enough to change the attitude and

behaviour of the employee, the supervisor shall escalate to the Head of HR and the next disciplinary process as detailed below will follow:

10.3.7 Notice to Show Cause

The Head of HR will: -

Forward to the employee a statement of the charge or charges to be preferred against the employee with brief statement of the allegations and call upon the employee to state in writing within three (3) working days any grounds for his defence (Notice to Show Cause Letter)

10.4 Disciplinary Hearing

The Head of HR will review the response from the employee and evidence submitted by their immediate supervisor and will refer the matter to the Disciplinary Committee with all relevant documentation, or deal with it himself/herself as need be.

The employee will have the right to be accompanied to the disciplinary hearing with an employee of their choice who will be there to offer moral support to the employee and be a witness to the process, but not take active part in the discussions.

10.5 Composition of the Disciplinary Committee

The Disciplinary Committee is constituted on ad hoc basis and depending on the position held by the accused employee for example, where the accused employee is on supervisory level, the middle management should constitute the committee. The HoD from which the matter giving rise to disciplinary action arose should not chair or be part of the disciplinary hearing committee but can play the role of an investigator and present evidence. The accused employee should be granted an opportunity to appear with a colleague of his choice unless he declines then both parties have a right to invite witnesses to support their case. Where the issue of discipline has not arisen from the HR department, it is preferred that a representative from HR Department acts as the secretary of the Disciplinary committee. The members of the committee should **not** have been involved in any way with the charge or investigations taken against the employee concerned, nor be from the same Department as the employee concerned.

Procedure

1. The Committee upon considering the report shall inform the employee that he will be required to appear before the Committee to respond to the charges meted on him;
2. The Committee will permit the concerned employee to appear with a work colleague of their choice if they so desire. The colleague who accompanies him may act as a witness and may take notes but should not take active part in the proceedings;
3. The employee shall have the right to call any witnesses to give evidence during the disciplinary hearing as directed by the Disciplinary Committee. The accused employee shall be given opportunity of being present and of putting questions on his own behalf to any witnesses in the hearing.
4. No documentary evidence shall be used against the employee unless he has been supplied with copies or extracts thereof or given access thereto at least twenty four (24) hours prior to the disciplinary hearing
5. If during the course of the inquiry, grounds for the preferment of additional charges are disclosed, the Committee shall so inform the employee.

10.6 Functions of the Disciplinary Committee

The Committee will: -

1. Hear evidence from both sides;
2. Forward its report thereon to the Head of HR/Group CEO where applicable with:
    a) the record of the charges preferred
    b) the evidence adduced
    c) the defence and other proceedings relevant to the hearing;
3. Report, whether in its opinion, the accused employee has or has not committed the offences as charged and give a brief statement of the reasons for its opinion; and
4. Give details of any matters which in its opinion aggravate or alleviate the gravity of the case;
5. Summarize and make such comments as will indicate clearly its opinion on the matter;
6. Make recommendations regarding the form of disciplinary action, if any.

10.7 Decision of the HRM

Upon receipt of the Report of the Disciplinary Committee, the Head of HR shall consider the report and may take appropriate disciplinary action or refer the matter back to the Disciplinary Committee for further investigations and recommendation.

10.8 Right of Appeal

Where an employee is not satisfied with a disciplinary action taken on him, he has the right to appeal (single appeal) to the next higher level of management that were not involved in hearing and determination of the matter.

The Group CEO shall handle appeals lodged by all employees under him beginning from his immediate reports.

The Board of Directors shall handle appeals where the Group CEO or Business Unit Head is involved; including a case that was presided by the Group CEO.

The Appeal Shall: -

1. Be made within a reasonable time frame; at least within seven (7) working days of the notification of the decision;
2. Be signed by the employee;
3. Set the grounds of Appeal in sufficient details; All Appeals will be heard as speedily as possible.

The higher authority will consider the Appeal and shall make a decision to institute an appeal hearing if he deems it necessary which shall be separate from the initial disciplinary committee. The higher authority shall then confirm to the employee the results of the appeal in writing within three (3) weeks of the appeal.

If an appeal to the higher authority against dismissal is successful, the employee will be reinstated and full payment will be made for the period between dismissal and reinstatement.

The decision of the appeal hearing will be final.

10.9 Disciplinary Matters Involving Senior Management Staff

The steps stated herein shall apply. Important to note is that middle level management will be handled by top level management and top-level management will be handled by the Group

CEO and Executive Directors. Disciplinary matters involving the Group CEO will be handled by the Board of Directors.

10.10 Types of Disciplinary Actions

1. Verbal/Oral warnings
2. Written warnings
3. Recovery of days of absence from salary
4. Termination
5. Surcharge
6. Summary dismissal

10.10.1 Verbal/Oral Warning

This is an interview or formal discussion between the supervisor and the employee regarding the latter's poor work habits, deficiencies, attitude or failure to follow a rule, regulations or lawful instruction etc. Verbal warning is for first infraction of less nature and will be for corrective measure to deter the employee from actions that may lead to a more severe warning. Immediate supervisors are advised to document such warnings for future reference.

10.10.2 Written Warning

This is a written statement to an employee describing his poor work habits, deficiencies, attitude or failure to follow a rule, regulations or lawful instruction etc. If an employee commits an offence which in the opinion of the Company does not warrant instant dismissal, such an employee shall be warned in writing.

This action is for a repeat of a less serious infraction (minor misconduct) or the first of a more serious infraction (gross misconducts). Written warnings are cumulative to two; a third warning is a summary dismissal i.e. if an employee is served with two (2) warnings issued within a period of 12 months, dismissal shall be effected upon commission of the third offence within the period. This will be followed for all cases of minor and gross misconduct for all staff.

All written warnings will be issued by the Group HRM Which the employee will acknowledge and sign. A copy of the warning letter will be maintained in the employee's file. However, no reference shall be made if the written warnings are over 12 months old.

10.10.3 Recovery of Days of Absence from Salary

Recovery of days/hours absent, without authority, from an employee's salary can be used as a form of disciplinary action to deter the employee from repeating such an offence.

10.10.4 Surcharge

Surcharge may be used as a form of disciplinary action for payment of company property willful and intentionally damaged or misplaced by an employee. The decision to surcharge will be at the sole discretion of the management upon full investigations into the matter to confirm that the damage or loss was not intentional or due to willful neglect.

10.10.5 Termination

Following the report received from the Disciplinary Committee, the Head of HR may terminate the services of an employee following their unsatisfactory conduct. The affected employee will be given a notice period as per terms and conditions of his employment.

10.10.6 Summary Dismissal

Dismissal may be made based on gross misconduct without prior corrective (warning) action. Subject to the procedure mentioned above (termination) the final decision shall be that of the Group CEO. Summarily dismissed employee will not receive any notice payment or any other separation benefits unless those statutory prescribed.

10.11 Disciplinary Rrecords

All records of disciplinary action will be filed in the employee's personal file. Lapsed disciplinary records (above 12 months period) will not be removed from employee's personal file, but no reference can be made of them when a disciplinary hearing is ongoing.

Once a disciplinary measure has lost effectiveness, records may only be used to identify historical patterns in misconduct.

10.12 Other Key Provisions

10.12.1 Criminal Offences

Where an employee is suspected to have committed a criminal offence, the employer at their motion and discretion, may report the occurrence to the police for investigations and possible eventual prosecution.

The fact that an employee is under police investigation or has been arraigned in court, does not in any way stop the employer from initiating internal disciplinary mechanisms to its logical conclusion.

11 GRIEVANCE HANDLING

11.1 Policy Statement

A grievance is a complaint; a feeling of injustice or unfairness which comes to the attention of supervisors or other members of management.

It is a policy requirement that employees are given a fair hearing on any grievance that may arise out of their employment with the Company and are entitled to appeal to higher levels of management if they feel that their grievance has not been addressed satisfactorily.

11.2 Policy Objective

The objective is to provide a formal channel through which employee can bring a grievance to the attention of management, and to ensure it is resolved promptly, professionally and in a fair manner.

11.3 Guiding Principles

1. Grievances will be resolved at the point of origin as much as possible;
2. Grievances should be addressed as expeditiously as possible;
3. The immediate supervisor should take the lead in resolving any conflict brought to his attention by the employee. The employee should also be counseled;
4. Officers dealing with the grievance should empathize and handle the issue objectively and in a fair manner

11.4 Exclusions

The Grievance Procedure will **not** be used to: -

1. Lodge an objection against a disciplinary decision.
2. Amend any mutual agreement or contract with the employer. (c) Amend the individual contract of employment.
3. Raise, discuss and or argue any matter of a political, religious or community nature.

11.5 Grievance Handling Procedure

In resolving grievances, the following **procedure** will be followed: -

1. Whenever an employee feels aggrieved, the employee (s) shall be required to promptly report in writing, and formally discuss with immediate supervisor within five (5) working days. The immediate supervisor shall respond immediately by initiating a discussion to resolve the grievance but must act within five (5) working days of notification of the grievance.
2. If the immediate supervisor is the cause of the employee's problem or the employee is not satisfied with the response from the immediate supervisor, he/she may in writing within five (5) working days report his case to the Head of HR who will discuss the issue with the employee within seven (7) working
3. Group HRM investigate the matter, including speaking with the immediate Supervisor, the Head of Department, other employees and anyone familiar with the complaint and mediate the matter so as to arrive at a satisfactory resolution. This has to be done within five (5) working days of receipt of the complaint;
4. If the matter is not mutually resolved within the five (5) working days, the employee shall escalate in writing the dispute to the next higher authority who shall be under obligation to resolve it within fourteen (14) days;

5. If the matter from the point of view of the next higher authority warrants further investigations and reference to a Grievance Handling Committee, an ad hoc Grievance Handling Committee will be constituted to hear the grievance and resolve it. The resolutions to the grievance should be concluded within 30 days.
6. The recommendations shall be submitted to the Group HRM who will consider all facts presented including hearing the aggrieved employee(s) where necessary and take the final decision within seven (7) working days of receipt of the committee recommendations.

At any level during hearing, employees may have the assistance of one advisor of their choice to assist, consult with and provide advice on their behalf. The immediate Supervisor may have similar assistance from one advisor of their choice. The advisors must be employees of the Company who are covered by the grievance process. No outside representatives shall be allowed.

When an employee does not appeal at any of the stages within the established time limits, the grievance shall be deemed settled with the last company management response. Time limit may be extended only by mutual written agreement of the parties due to extenuating circumstances.

11.6 Other Key Provisions

1. Centum recognizes that not every problem can be resolved to everyone's total satisfaction, but only through understanding and discussion of mutual problems can employees and the management develop confidence in each other. This confidence is important to the attainment of an efficient and harmonious work environment.
2. Officers dealing with the grievance shall keep a record of all proceedings and shall ensure that they are maintained in strict confidence.
3. Centum prohibits any form of retaliatory action against any employee who raises a complaint. Retaliation is a violation of this policy and may result in discipline, up to and including summary dismissal.

12 WHISTLE BLOWING

12.1 Policy Statement

Centum aims to create a climate where workplace concerns and irregularities can be reported safely and without fear of retribution and victimization. With employees help, Centum wishes to encourage an open and ethical workplace and promote a culture of reporting wrongdoing.

12.2 Policy Objectives

The objective of this policy is to guide employees on how to raise concerns about possible unlawful and unethical conduct or breaches of company policy to the right people in a safe and secure way and provide information as to what should be reported, as well as set out how employees will be protected.

The effective implementation of this policy will encourage a culture of trust and confidence among staff and increase market and consumer confidence. This will encourage employees to report their concerns at an early stage and allow the necessary corrective action to be taken.

12.3 Application

This policy applies to all employees within Centum.

12.4 Guiding Principles

1. **Good Faith**
    a) Concerns must be reported in good faith. Those found to be raised maliciously, for personal gain or reward may result in an employee not qualifying for protection under this Policy;
    b) Knowingly making a false disclosure or making a disclosure with ulterior
    c) motives may also lead to the reporting employee being subjected to disciplinary process;
    d) Proof of the allegation is encouraged as this will be helpful.
2. **What this Policy does <u>not</u> cover**
    a) Reports must be made in accordance with the procedures in this Policy or an employee will not be protected in terms of this Policy;
    b) The Policy is not aimed at the reporting of employment grievances or general complaints. The HR Policy and procedures will address issues where an employee is aggrieved, discontent or unhappy;
    c) If an employee's concern falls more within the Grievance Procedure, the employee is required to act via the provided appropriate Human Resources channels.
3. **Concerns that can be raised and reported;**
    a) Criminal offences such as fraud, theft, corruption, money laundering and terrorism;
    b) Any type of financial misconduct, including negligence;
    c) Danger to the work environment or the safety and health of others
    d) Unfair discrimination;
    e) Internal irregularities, including conduct that goes against any company policy or procedure;

4. **Deliberate cover-up of any of the above;**
    a) Any other unlawful or unethical conduct relating to the workplace;
    b) If an employee is unsure as to whether an issue should be reported, he should ask himself;
    c) Is the conduct legal?
    d) Is the conduct in line with the employee's contractual obligations to Centum?
    e) Is the conduct in line with Centum's policies and procedures?
    f) Is the conduct in line with Centum's values?
    g) Does the conduct feel right?
    h) Would you be happy if your manager, supervisor or colleagues were aware that you knew about the conduct and you did not report it?

12.5 Whistle blowing procedure;

1. An employee may raise the matter directly with the Head of Risk for investigation. An employee may state if they are willing to reveal their identity to the above or if the above are permitted to reveal their identity for the purposes of the investigation.
2. Once the Head of Risk becomes aware of the employee's report, they will review it and assess what action needs to be taken. If the Head of Risk knows who the reporting employee is, he will be able to provide feedback. He will tell the reporting employee who is handling the matter, how they can contact them and whether they require further assistance. The audit team will conduct an impartial and objective investigation and submit a confidential report with findings and recommendations to Management. Criminal matters will also be reported to the appropriate law enforcement authorities. Matters which are time sensitive will be given priority.

For Reporting and investigations procedures Refer to the Group Whistleblowing Policy Version 3 of 2025

12.5 Protection

Centum will take all reasonable steps to ensure that those who raise concerns in accordance with this Policy are protected from harassment, victimisation or other forms of unfair labour practices.

Only designated Risk management and audit team members have access to the information supplied by the reporting employee who have signed confidentiality agreements to keep the information secure.

12.5.1 Anonymity

Employees have a choice to report their concerns without giving their identity. An employee's identity is automatically protected and will not be revealed to anyone. Employees are however encouraged to reveal their identity as without it, it will be difficult to clarify details or confirm information they have provided or to give them feedback.

12.5.2 Confidentiality

Centum recognises that an employee may wish to raise a concern confidentially. Even if they have identified themselves to Risk management /Audit, they will not disclose the identity without the employee's consent. If the situation arises where they are not able to resolve the concern without revealing the reporting employee's identity (for example where your evidence is needed in Centum's disciplinary hearing or in court), they will discuss with the reporting

employee whether and how to proceed. Centum can however never force an employee to reveal their identity or force an employee to testify if they are not willing or prepared to do so.

Note though that Centum has a legal obligation to report certain suspected offences to the law enforcement authorities. These authorities do have legal powers to compel witnesses to testify in court.

12.5.3 Safety

If an employee raises a concern in good faith under this Policy, they will not be at risk of losing their job or suffering any form of victimization. Provided they are acting in good faith, it does not matter if their concerns are mistaken. No action will be taken against an employee if the allegation turns out to be unfounded.

Centum undertakes to assist a reporting employee, as far as possible, if they become a victim of harassment because they blew the whistle. If necessary, and if the reporting employee requests it, this may include transferring them to another position in the company. Any employee who is found to be harassing another employee for blowing the whistle may be subject to disciplinary procedures up to and including termination.

Centum will respond to all matters justly, fairly and impartially. Employees are encouraged to inform Head of Risk if they are being harassed, victimised or subjected to an unfair labour practice, after making a report.

13 WORKPLACE HARASSMENT & DISCRIMINATION

13.1 Purpose

At Centum, we are committed to providing a work environment that is free from harassment and discrimination. We believe in treating all employees, contractors, and visitors with dignity, respect, and fairness. Harassment and discrimination of any kind—whether based on race, gender, sexual orientation, religion, age, disability, or any other protected characteristic—will not be tolerated.

Any behavior that creates a hostile, intimidating, or offensive work environment, including but not limited to bullying, offensive comments, or unwanted physical contact, is considered harassment. Additionally, any actions that result in unequal treatment, such as discriminatory hiring practices, unfair pay, or biased promotion decisions, are considered discrimination.

Centum is dedicated to maintaining a safe and inclusive workplace, where every individual has the opportunity to thrive. We encourage all employees to report any instances of harassment or discrimination, and we ensure that all reports will be taken seriously, investigated thoroughly, and addressed promptly.

13.2 Sexual Harassment

Centum does not tolerate sexual harassment of its employees. Sexual harassment has no place in the workplace. The Company has made a commitment to its employees to ensure a working environment free from sexual harassment. On the event of the occurrence of sexual harassment, employees should not hesitate to use the procedures set out below.

In compliance with the Labour Law under Employment Act Part II, Section 6, Centum is committed to providing a working environment free of sexual harassment where individuals are treated with respect and dignity. Centum further believes that:

1. An employee should be accorded the opportunity to work in an environment free of sexual harassment
2. Sexual harassment is a gross misconduct that undermines the employment relationship
3. No employee either male or female should be subjected verbally or physically to unsolicited and unwelcome sexual overtures or conduct

The Company shall take whatever disciplinary measures it deems appropriate against any of its employees who subject any employee to sexual harassment and breaches this policy.

13.3 The Scope

This policy applies to all Centum and its subsidiary employees, Executive members, contractors, consultants, vendors, and other stakeholders engaging with Centum in any capacity. It covers conduct occurring: Within Centum's premises or during official business, At work-related events, including conferences, workshops, and social gatherings and Through electronic communication or social media related to Centum activities.

13.4 Policy Objective

The objective of this policy is to define sexual harassment, provide procedures for the investigation of sexual harassment claims, and ensure that violations are remedied fully. This policy applies to all employees of Centum within or outside work premises.

13.5 Legal Definition of Sexual Harassment

In accordance with the Employment Act, an employee is sexually harassed if the employer of that employee or a representative of that employer, or co-worker;

1. Directly or indirectly requests that employee for sexual intercourse, sexual contact or any other form of sexual activity that contains an implied or express;
   a) Promise of preferential treatment in employment;
   b) Threat of detrimental treatment in employment; or
   c) Threat about the present or future employment status of the employee;
2. Uses language whether written or spoken of a sexual nature;
3. Uses visual material of a sexual nature; or
4. Shows physical behavior of a sexual nature which directly or indirectly subjects the employee to behavior that is unwelcome or offensive to that employee and that by its nature has a detrimental effect on that employee's employment, job performance or job satisfaction.

13.6 Reporting Mechanisms

The company encourages all individuals to report incidents of sexual harassment promptly.
For reporting procedures refer to Group Whistleblowing guidelines Clause 3(i).

13.7 Investigations Procedures

1. A report of the alleged offence with evidence should be made under strict confidentially to the immediate HoD. Where a complaint is to be lodged against the immediate HoD, the employee should involve the Head of HR
2. An investigation of the alleged harassment will be handled through the HoD concerned in a strictly confidential manner so as to protect the privacy of persons involved. Strict confidentiality will be maintained throughout the investigatory process
3. In pursuing the investigation, the Head of HR will listen to the complainant, but will thoroughly investigate the matter as appropriate under the circumstances and make an informed decision;
4. The alleged offender will be furnished with the investigation report and evidence to support the complaint and will have the right to respond and present witnesses.
5. If the conclusion is that harassment occurred, the alleged offender will be subject to appropriate disciplinary process. The complainant will be summoned to appear before the disciplinary committee in order to state his case and adduce evidence to that effect;
6. In the event the harassment cannot be substantiated, this finding will be communicated to the complainant in an appropriately sensitive manner.
7. If any party directly involved in a sexual harassment investigation is dissatisfied with the outcome or resolution, that individual will have the right to single appeal the decision like any other disciplinary case. The dissatisfied party should submit their written appeal within seven (7) days to the Head of HR;
8. Individuals found to have engaged in misconduct constituting sexual harassment will be disciplined, up to and including summary dismissal.
9. If an investigation results in a finding that the complainant falsely accused another of sexual harassment knowingly or in a malicious manner, the complainant will be subject to appropriate sanctions, including the possibility of termination.

13.8 Consequences of Sexual Harassment

The company will impose strict disciplinary action against individuals found guilty of sexual harassment, which may include: Verbal or written warnings, Suspension or demotion, Termination of employment or engagement, Legal action where applicable.

13.9 Support for Victims

The company will provide the following support to victims, Access to counseling and psychological support, Assistance in filing legal complaints where necessary, Protection from retaliation or further harassment.

13.10 Roles and Responsibilities

All employees have a responsibility to comply with Centum's policy and to treat colleagues of both sexes with dignity and respect. Allegations of sexual harassment will be dealt with seriously and confidentially. No employee who makes a genuine complaint on the grounds of sexual harassment need fear reprisal or victimization.

1. **Employees and Stakeholders**: Must uphold the principles of this policy and report any violations,
2. **Supervisors and Managers**: Responsible for preventing harassment within their teams and acting promptly on complaints,
3. **Human Resources Department**: Ensures timely handling of complaints and enforcement of this policy,
4. **Centum Leadership**: Promotes a culture of respect and ensures compliance with this policy.

13.11 Training and Awareness

The company is committed to conducting regular training programs and awareness campaigns to: Educate all stakeholders about their rights and responsibilities under this policy, Reinforce a zero-tolerance stance on sexual harassment.

13.12 Retaliation Prohibited

Centum will permit no employment-based retaliation against anyone who brings a complaint of sexual harassment or who speaks as a witness in the investigation of a complaint of sexual harassment.

14 HIV/AIDS POLICY

14.1 Policy Statement

Centum does not consider HIV/AIDS to be of any lesser or greater importance than other life-threatening illnesses in the application of this policy. This policy has been designed to ensure that all employees are treated equitably, compassionately and without discrimination should they or one of their peers develop a life threatening or chronic illness.

Because HIV cannot be transmitted through the course of the usual interpersonal contact occurring in the workplace, it is being considered here with other illnesses that are not contagious. Employees with contagious diseases are not considered in the following policy section and each situation shall be evaluated on an individual basis.

14.2 Guiding Principles

The principles that guide this policy are in accordance with international conventions, national laws, policies, guidelines and regulations. These include but are not limited to:

1. **Recognition of HIV and AIDS as a workplace issue**
   Centum recognizes that HIV infection is a life-threatening illness, like cancer or heart disease, and that employees with HIV infection will be treated like those with other life-threatening illness.
2. **Non- discrimination**
   Centum shall:
   a) Not discriminate against any employee or beneficiary based on HIV infection or other illness;
   b) Refrain from the use of testing to detect the presence of HIV when hiring, transferring or promoting employees;
   c) Ignore and/or destroy any second-hand information concerning an employee's health;
   d) Refuse to tolerate discrimination or harassment of employees, clients, suppliers and associates with chronic illnesses or HIV infection;
   e) Ensure that employees with HIV infection and other life-threatening illnesses are given information on where they can obtain counseling and support; and
   f) Continue to develop and circulate educational information on HIV infection and other life-threatening illnesses where employee education is deemed necessary;

Discriminatory acts by fellow employees against an employee with HIV infection or chronic illness are unacceptable and shall be subject to disciplinary action.

Employees with life threatening illnesses including HIV infection have the right to:

1. Continue working as long as their condition permits, and as long as they can reasonably fulfill their responsibilities and carry out their duties in the workplace;
2. Receive the same benefits coverage as is accorded other employees; and
3. Be accorded complete confidentiality concerning their illness or HIV status.

Other employees have the right to:

1. A safe and healthy work environment; and
2. Education about HIV infection

Centum will make reasonable accommodation to the work schedule or duties of an employee with HIV infection or chronic illness when the employee's conditions so require.

Clients, suppliers, partners and associates outside Centum have the right to receive services without discrimination based on illness or perceived illness.

Managers shall be required to demonstrate leadership in addressing HIV/AIDS pandemic in the workplace through participation in awareness programs and counselling for all employees. They are also expected to be sufficiently informed about the pandemic to guide other employees in matters concerning the scourge.

14.3 Privacy and Confidentiality

The maintenance of confidentiality about an individual's medical condition is an imperative principle at Centum. This principle applies no less to persons with HIV infection.

Because of the fear and prejudice surrounding AIDS, a breach in confidentiality can have disastrous effects on an employee's personal and professional life.

If the employee's illness reaches the point where work schedules are disrupted or adjustments have to be made, a medical certificate may be required, but the certificate should only refer to the employee's capability to continue working and need not mention HIV or AIDS or any other illness specifically.

No employee shall be compelled to disclose his or her HIV status. In cases where employees with HIV inform management of their situation, all reasonable precautions will be taken to ensure confidentiality and the employees' right to disclosure will be observed. Access to personal data relating to a worker's HIV status will be bound by the rules of confidentiality.

14.4 Education

Information, Education and Communication
Through education and dissemination of information, Centum hopes to influence attitudes, change behaviours and help in the prevention, management and care of HIV /AIDS and promote the overall health of its employees. The Company will initiate a peer education program to inform and educate its employees on HIV and AIDS prevention, care and support including encouraging them to visit VCT centres.

14.5 Treatment, Care and Support

Supportive Counselling for HIV positive employees
Employees who are HIV positive will have access to counselling services to encourage them to cope with the status.

14.6 Opportunistic Infections

Centum encourages infected employees to seek early treatment. In as far as possible the Company will seek for a scheme which will cover this condition.

14.7 Anti-Retroviral Therapy (ART)

Employees who require ARVs are encouraged to seek this service at government health institutions. The Company will be available to link such employees to various institutions that support and supply ART provision.

15 HEALTH AND SAFETY

15.1 Policy Statement

Centum is committed to provide a high standard of Health and Safety management within all its premises at all times with a view of making the company an excellent working place. The management are committed to this policy and require that all employees at all levels play their part.

Therefore, Centum undertakes to;

1. Comply with the relevant legislatives;
2. Maintain effective Health and Safety Committees;
3. Provide appropriate safety wear to all employees as appropriate and enforce the proper use of the same;
4. To provide appropriate safety training to employees;
5. To continuously monitor the working environment, based on regular risk assessments.

15.2 Policy Objective

Centum's effective implementation of provisions of this policy shall ensure a healthy work force that will realize:

1. Management of the levels of risk within the group through continuous assessments, and action plans based upon these assessments;
2. Ensure that all employees are able to work safely and efficiently with a good knowledge of all potential hazards and avoidance thereof;
3. Endeavor to prevent all accidents or occupational injuries that might affect the health of group employees, contractors and visitors to the premises.

13.2 Guiding Principles

To meet these objectives this policy will be implemented in compliance with the provisions of Occupational Safety and Health Act 2007 and guided by the following implementation guidelines: -

1. Compliance with all relevant statutory instruments of law and any other circulars issued by the management as guidelines in all matters of Health and Safety;
2. Formulation of rules and guidelines on matters of Health, Safety and Disaster management and ensure compliance of the same;
3. Strategies and activities on how the safety and disaster preparedness objectives can be met;
4. Eradication and minimization of accidents and related costs;
5. Putting in place practical precautions to safeguard the health and safety of all employees, clients, visitors, public, contractors and environment;
6. Informing, educating and communicating adequately to all cadres of employees on the risks to their health and safety that they may be exposed to;
7. That all working conditions and equipment are safe and working places are regularly inspected;
8. All employees assume defined responsibilities in matters of health and safety in conformity with this policy;
9. An establishment of Health and Safety Committee to monitor, evaluate and view performance standards under these guidelines.

15.3 Responsibility

All levels of employees have a mandatory responsibility to ensure the Health and Safety of themselves and the rest of the workforce while in the work place. They shall provide leadership by participation and example in demonstrating their commitment to Health and Safety as follows.

15.3.1 Executive Committee;

Are responsible for:

1. Ensuring the Health and Safety of all employees, preservation and protection of the environment as it may be affected by the company's activities;
2. Ensuring that the company's Health and Safety policy is developed, communicated understood accepted and implemented by employees at all levels;
3. Ensuring the resources necessary for developing and implementing programs on promotion of Health and Safety awareness in the company are budgeted and provided for;
4. Representing the interests of the company on issues relating to safety and health in high-level government and other stakeholder forums.

15.3.2 Safety Officer

The safety officer shall be responsible for;

1. The safety officer shall facilitate achievement of a high standard of safety throughout the company;
2. The officer has to inform Management of all new legislation affecting the company and advice on interpretations, codes of practice etc. At all times he will maintain and liaise with departments and give help and information on all aspects of accident prevention. He will appraise and advise on all practical aspects, plant and methods of working affected by new and existing legislation;
3. Ensure that the policy for health and safety is effective and will periodically appraise its effectiveness and ensure that any necessary changes are made;
4. From time to time consult with the company health and safety committee on matters relating to health and safety;
5. The safety Officer will suggest and recommend improvements, take part in the training and education of supervisors and other employees, conduct or participate in safety meetings, act as coordinator of the safety work and be a liaison agent with higher executives;
6. The Safety Officer will periodically inspect plants, machinery, tools and various work operations to determine mechanical and occupational hazards and unsafe practices of the employees.

15.3.3 Heads of Business Units/HoDs/Managers

Senior supervisors will be responsible for ensuring that the Health and Safety policy is implemented within their own business units. HoDs/Managers must monitor the workplace to ensure that safe working conditions are observed and maintained. Where risks are identified they must ensure that these are rectified, so far as it is practicable.

They have a duty to: -

1. Communicate to the employee's Health and Safety policies as directed by management;
2. Communicate to the management complaints relating to health and safety from employees;

3. Ensure that accidents, incidents, dangerous occurrences, and work related ill health are reported, recorded, investigated, and all steps are taken to prevent possible re-occurrence as detailed in the company's procedures and requirements;
4. Keep the Company Management informed on the state of Health and
5. Safety in the departments falling under them;
6. Ensure regular consultative meetings on Safety and Health are held for
7. their departments' Health and Safety representatives and supervisors;
8. Ensure each person at work within the department under their control receives the appropriate Health and Safety training instructions and facilities required for the execution of their assigned duties;
9. Ensure adequate Health and Safety background information is provided to the persons at work so that they are able to fully understand the instructions given to them;
10. Ensure regular audits are conducted to ensure that instructions given are adhered to;
11. Ensure employees' comments on Health and Safety are given due attention;
12. Ensure plant equipment and production processes are operated and maintained such as to adhere to the given instructions and legal requirements;
13. Carry out initiatives that will promote and encourage best Health and Safety practices and minimize losses related to workplace injuries and ill health;
14. Act on recommendations of the Health and Safety Committees, Safety
15. Auditors to ensure healthy and safe working conditions;
16. If unpredictable Health and Safety issues arise during the year, the Executive Committee must assess the degree of risk in deciding the necessary resources and actions to commit to addressing these issues;
17. For major additional expenditure, cases of need will be submitted to the Executive Directors.

15.3.4 Supervisors

These categories will:

1. Acquaint themselves with the legal requirements applying to operations and processes under their control and ensure that infringements do not occur;
2. Ensure that permanent employees are familiar with the Safety Precautions and Controls governing the facility with which they are concerned. Specifically, they will ensure that safety instructions, risks and hazards are communicated to all new employees and to those persons entering the premises for carrying out a defined task which is relevant to the facility in question;
3. Ensure that safety policy information instructions are understood accepted and implemented;
4. Ensure that any defective equipment tool machinery or unsafe work practice unsafe condition unsafe process or anything which poses risk to the Health and Safety of employees is rectified or brought promptly to the notice of management for rectification;
5. Ensure that employees' complaints requests and/or recommendations are brought to the attention of the managers and or the Health and Safety Officer for direction;
6. Influence change in the health and safety attitudes and behavior of employees;
7. Carry out preliminary investigations of accidents including those causing injury to persons and damage to property and to report to their managers;
8. Satisfy themselves as to the safety of any new plant equipment process or method of working before putting them in to operations;
9. Ensure where necessary that the correct protective clothing or safety equipment is available and that it is issued to and used by the employees concerned;

10. Liaise with the safety officer safety and health and safety committees and specialized departments where necessary.

15.3.5 Employees

Every employee has the responsibility to:

1. Not willfully interfere with or recklessly misusing any means or appliance or anything provided in pursuance to Health and Safety and welfare at the workplace;
2. Ensure that he does not willfully and without reasonable cause do anything likely to endanger himself or any other person or the environment;
3. Cooperate with the Management in achieving and maintaining a healthy and safe workplace;
4. Implement the Health and Safety policy;
5. Work in accordance with the information and training provided;
6. Not undertake any task for which authorization and training has not been given;
7. Report any dangerous defects or shortcomings in the existing health and safety arrangements to their supervisor without delay;
8. Report all accidents incidents and dangerous occurrences upon self or colleagues to shortcomings in the existing health and safety arrangements to their immediate supervisor immediately they occur.

15.4 Health & Safety Committee

15.4.1 Formation of the Committee

Under the Occupational Safety and Health Act 2007, the Group shall establish a Health and Safety Committee in the manner provided in these rules. The company acknowledges the importance of employee's involvement in Health and Safety matters and the importance of the positive role played by health and safety representatives. As such, it is the intention of the company to provide the facilities and assistance so that health and safety representatives can carry out functions effectively as per Safety and Health Committee Rules Legal Notice No. 31 of 2004.

15.4.2 Organization of the Committee

1. The Group Chief Executive Officer or his nominee shall be the Chairman of the Committee. The person responsible for health & safety (i.e. one the Safety Officer) shall be the Secretary. Another safety officer shall be a substitute for the Secretary;
2. The committee shall consist of not less than 3 members of management (including the Chairman and Secretary) and not less than 3 workers;
3. The workers shall be elected following a procedure agreed upon between the Management and the workers;
4. There shall be equitable representation of sections and gender priority within the committee;
5. Safety representatives shall serve on the Committee for a term of 3 years and shall be eligible for re-election or reappointment for one further term;
6. Management shall support Safety Representatives in carrying out their role and give all reasonable assistance. Safety Representatives shall be encouraged to discuss specific Health and Safety issues with the relevant Heads of Business Units. They may also formally report hazardous or unsafe circumstances to the Heads of Department and shall be formally notified of the remedial action taken or be given a reason why the action cannot be taken.

15.4.3 Functions and Duties of the Committee

The functions of the Committee shall include the following:

1. Establish a schedule of inspection of the workplace for each calendar year;
2. Conduct health and safety inspection at least once in every 3 months;
3. Inspect, investigate and make recommendations to the Group CEO immediately after an accident or dangerous occurrences takes place;
4. Identify occupational hazards and cases of ill-health among workers at the workplace; Compile statistics of accidents, dangerous occurrences and cases of ill-health among workers at the workplace and make appropriate recommendations and make appropriate recommendations to the Group CEO;
5. Investigate complaints relating to workers health, safety and welfare at the workplace and make representation to the Group CEO;
6. Advise on the adequacy or otherwise of health and safety measures for particular hazardous work or activities;
7. Establish effective communication channels on matters of Health and
8. Safety between management and workers;
9. Organize such contest or activities necessary for achieving the fulfillment of the mandate of the committee;
10. Conduct seminars and workers, education programs and provide information for health & safety at the workplace;
11. Carry out any other functions necessary for the promotion of a healthy and safe working environment.

15.4.4 Meeting and Minutes of the Committee

1. The Committee shall meet not less than four times per year and not more than 3 months shall elapse between the date of one meeting and the date of the next meeting;
2. Notwithstanding point
    a) The Chairman shall convene a meeting of the Committee within 24 hours following any accident or other dangerous occurrence, or the outbreak of an illness, at the workplace.
    b) The minutes of such a meeting shall be forwarded to the Directorate of Occupation Health & Safety Services within 7 days from the date of the meeting;
3. The Chairman shall convene a meeting of the committee on application of at least 6 members;
4. The secretary shall summarize the minutes of each meeting, giving the final decisions and plans of action arrived at during the meetings. The summary shall be distributed to the various members of the Committee who in turn shall communicate such information to the workers whom they represent. A copy of this summary shall be given to the Group CEO.
5. **Roles of Executive Directors** The roles of the Company Directors and/or their appointed representative (i.e. the Chair of the Health & Safety Committee) are set out in Section 9 of the Safety and Health Committee Rules of 2004 and shall be followed.

15.4.5 Training of the Committee

Every member of the Committee shall undertake a prescribed training course in occupational Health and Safety within a period of 6 months from the date of appointment or election and thereafter, further training from time to time.

15.5 Safety and Health Audit

The Company Directors shall ensure that a Safety and Health audit of the workplace is carried out at least once in a period of 12 months by a registered Safety and Health Advisor. The report from this audit shall be kept by the Chief Executive Officer and/or Chair of the Health & Safety Committee and a copy of the same sent to DOSHS within a period of 30 days following the audit.

15.6 Medical Services

The Company shall provide medical treatment for workforce in accordance with The Work Injury Benefits Act, and the Factories & Other Places of Work (Medical Examinations) Rules. Such treatment may not be given where injury/illness is contracted when an employee is absent from the workplace or the injury/illness is self-inflicted or the result of substance abuse as per The Employment Act.

Medical services shall be provided confidentially to the individual employee and include preventive and curative medical services (including the treatment of acute intoxication), health interviews and employment medicals.

15.7 Notification

1. The provision of Section 45 of OSHA, 2007 regarding the notification of occupational diseases shall apply for all abnormal results as set out therein.
2. Notification shall contain as outlined in the notification arm in the Fifth Schedule.

15.8 First Aid

1. It is the policy of the Company to make provision for First Aid and the training of First Aiders on an annual basis. First Aiders will be issued with certificates as proof of training;
2. First-Aid boxes shall be available and easily accessible in all areas of the company;

15.9 Plant and Machinery

Signs and posters relevant to the safe operation of machinery shall be prominently displayed. All machinery shall be fully guarded and be well maintained.

15.10 Lifts

The lifts will be inspected by approved examiner after a period of six (6) months or after any modification or extensive repair.

15.11 Other Health, Safety and Welfare Specifics

15.11.1 Emergencies and Accidents

1. A protocol shall be drawn up of all possible emergency situations (Disaster Plan). This will be displayed in a place visible to all, and will include the names of contact persons and their telephone or emergency numbers;
2. Procedures to be followed in case of accidents or emergencies must be understood by everyone and drawn up in a language spoken by the employees;
3. Dangerous and risky areas should be clearly marked as such in both permanent and temporary situations. Risk assessments shall be carried out on all operations;
4. Accidents shall be recorded in the General Register L.D. 206 and shall be reported to DOSHS using prescribed documentation. A written report must also be recorded on Form DOSH 1 and submitted to the Labor Office;

5. Any employee who is injured while his work shall be entitled to compensation in accordance with the Work Injury Benefits Act of 2007.

15.11.2 Drinking Water

All workers shall have continuous access to wholesome drinking water during working hours. Water quality must meet the Kenya Bureau of Standards/World Health Organization requirements.

15.11.3 Toilets

The Company shall provide sufficient and proper toilet facilities that are kept clean and hygienic. Adequate hand-washing facilities will be available and conveniently accessible.

15.11.4 Food hygiene

Those who have responsibility for food acquisition, storage, processing and serving shall be responsible for ensuring that these functions are undertaken to the necessary legal standards. Any suspected outbreak of food poisoning or other unexplained and possibly food related incidents must be reported to the Safety representatives.

15.11.5 Smoking

There will be no smoking within the Company premises. There will be signs clearly indicating this and all employees and visitors to the company must adhere to these rules.

15.11.6 Noise prevention and control

The Executive Directors and management have a responsibility to ensure compliance with the Factories and other Places of Work (Noise Prevention and Control) Rules 2005.

15.11.7 Sitting Facilities

For all workers whose jobs involve standing for long periods, the Company shall provide suitable facilities for sitting sufficient to enable them to take advantage of any opportunities for resting which may occur in the course of their employment as per the Occupational Safety and Health Act 2007.

15.11.8 Transport

The company vehicles shall be maintained in such a condition that the driving of the vehicle is not likely to be a danger to other road users or persons travelling in the vehicle as required by the Traffic Act Cap 403 and Environment Management and Coordination Act 1999.

15.11.9 Waste/Effluent Disposal

To ensure that waste is disposed off safely and in accordance with the statutory requirements. Three steps shall be followed:-

1. Waste shall not be allowed to accumulate but will be regularly removed to properly marked and suitable containers;
2. Ensure compliance with the duty of care imposed by the Environmental Management and Coordination Act 1990 and all relevant waste regulations;
3. Report any problem regarding waste or disposal immediately to a responsible person.

15.11.10 Work Area

All employees will be responsible for maintaining their work and personal work area in a state of cleanliness and hygiene with clear signage in case of danger eg. Wet floor.

15.11.11 Security

1. All Centum's offices, desks, files (paper and electronic), vehicles and other assets are Centum's property;
2. No materials belonging to Centum may be taken out of the premises by employees without permission in writing from their HoD;
3. Centum reserves the right to inspect any employee or vehicle or examine any parcel being carried into or removed from its facilities by an employee.
4. Any employee causing willful damage to Centum's property shall be deemed to have committed a gross misconduct;
5. All staff vehicles parked within Centum Tower will be provided with official parking.
6. Centum accepts no responsibility for personal property that may be brought or stored within its facilities;

15.11.12 Identification

Mechanisms have been put in place on how employees will always provide their identification to be allowed access within the office premises. However stringent measures will also be considered on how employees within office premises and while on official duty outside the premises will be required to identify themselves with identification badges which will be issued to them and be surrendered when exiting the company. They will also be required to comply with all safety and security protocols, communicated from time to time.

15.11.13 Care and Use of Centum Property

Employees who use Centum equipment/property are responsible for the correct usage and care of such equipment/property and must adhere to the procedure below always:

1. Employees receive training and instructions on the usage of equipment;
2. Employees should ensure that equipment are kept in the right place after use and always maintain them in a proper manner or advise the immediate manager when due for service;
3. Employees should report all damaged/faulty equipment or loss to their immediate supervisor;
4. Employees leaving Centum are required to return all equipment/property in their possession in good condition. Normal wear and tear is acceptable for returned property.

15.12 Safety Procedures

Employees have a duty to ensure that they:

1. Take responsible care for their safety and use safety equipment provided;
2. Refrain from acting in a manner, which is liable to cause injury to themselves or others;
3. All employees are obliged to carry out the lawful orders regarding safety rules and procedures laid down by management;
4. No employee is permitted to tamper with or misuse safety equipment installed or provided by management, for the protection of the office, health and safety of the employees;
5. Any employee who observes another disregarding the safety rules is to remind such a person of the rules and/or report them to the Health and Safety Committee

15.13 Electricity

No defective electrical equipment should be used by any employee.
Any faulty electrical equipment should be reported immediately to the Health and Safety Committee.

15.14 Cafeteria Safety

Care should be taken to ensure the following;

1. All electrical equipment is switched off when not in use.
2. The cafeteria is properly ventilated.
3. The water taps are turned off properly after use.
4. There is a fire extinguisher near the cafeteria premises.
5. The cafeteria must be kept clean and the floor must not be wet or slippery.
6. Regular fumigation and hygiene.

15.15 Items of Explosive, Corrosive, Flammable or Toxic Nature

These should not be stored in the office premises. If such chemicals are required to be stored for example because of construction or renovation activity or other such activity in exceptional circumstances, such storage should be in accordance with the storage instructions. In all cases the prior consent of the Head of Security should be obtained in writing.

15.16 Suspected Packages

If you discover a suspicious package or object, contact security personnel and the Head of Security immediately. Do not touch or move the item, but alert people in the vicinity to move away.

15.17 Hazards and Safety Measures

Common causes of accidents and hazards within a working environment that an employee should be aware of and avoid or report, include exposed electric wires or loose connections, slippery floors, loose carpeting, sharp edges of office equipment, broken glass, mishandling of work tools, unguarded machines and smoking cigarettes.

15.18 Safety Measures

It is the responsibility of the Company and its employees to ensure that hazards are avoided and overcome. Measures to guard against hazards include the safeguarding of hazardous machines/equipment, installation of electrical wires, provision of fireproof and firefighting equipment, drill on how to use such equipment, provision of first aid services and appropriate induction on safety measures in the workplace.

15.19 Training

1. Health and Safety training shall be incorporated into annual training programmed. Health and Safety training needs will, therefore, be identified and planned for in the same manner as other training needs.
2. Four areas of need shall be given special priority:
    a) Training for managers, to equip them with an understanding of the managers' responsibilities under this policy, the role and purpose of safety representatives;
    b) Training for safety representatives to enable them to discharge their functions effectively;

c) Training for all members of staff to acquaint them with the main provisions of the law and its practical implication and the main features of this policy and key safety rules;
d) Induction and in-service training for staff at all levels to acquaint them fully with new requirements and hazards.

15.20 Non – Employees

Persons working in Company premises

1. Persons working in the Company premises who are employed by other organizations are expected to adhere to the Centum's Health and Safety Policy and any Standard Operating Procedures (SOPs) which may emanate from this policy. This responsibility will be included in contracts or working arrangements as will an indemnity and necessary insurance to cover the Company for any such work.
2. Similarly, seconded Company employees working in other host premises will be expected to follow the host employer's Health and Safety Policy.

15.21 Visitors

The Company shall ensure that the Health and Safety of visitors to Company establishments is of the highest standard.

15.22 Machine and Equipment Suppliers

Suppliers are responsible for ensuring that the design construction of all new machines and equipment is such that it is safe and without risk to health when properly used.

15.23 Contractors

1. All contractors must report to the security office before proceeding to the department or section of the company where their work is being undertaken.
2. The manager of the department or their designed nominee will issue a signed "permit to Work" before any work or contract commences.
3. Contractors will be required to adhere to relevant provisions of the Occupational Safety and Health Act 2007 in discharging their contracts as well as any other written or otherwise communicated requirements of the company aimed at securing the safety and health of the workplace.

15.24 Risk Assessment

A detailed risk assessment will be carried for all activities. In each case the activity is described, tools and equipment used, possible risks defined, precautions required, training needs for safe working practices, any personal protective equipment needed, supervision level required, whether a permit to work is required.

Management staff at all levels must be completely familiar with the contents of this document. They should demonstrate a genuine commitment to ensuring all the Health and Safety provisions for a safe working environment are kept.

15.25 Publicizing and Promoting the Policy

15.25.1 Distributing the Policy

The company's statement of the policy and any other relevant information including suitable arrangement for issuing updates when necessary, will be brought to the attention of each employee in any of the following ways;

1. Issuing a copy of the policy statement with terms and conditions of employment;
2. Affixing the policy statement to accessible notice boards;
3. Carrying out induction training on the first day of service.

15.25.2 Safety Posters

Posters will be used as a means of promoting the Health and Safety policy and increasing safety awareness. To maximize their effectiveness, posters will be;-

1. Clearly printed and easily understood;
2. Noticeably located in a well-populated place;
3. Regularly changed so that their audience does not become immune to them through their over-exposure;
4. Seen by the right audience (displayed at the point of danger).

15.26 Fire Safety

It is Centum's policy to protect all persons in its premises from the hazards of fire by ensuring safe premises of work as far as is reasonably practicable in accordance with statutory requirements.

Specifically, Centum shall ensure:

1. Clearly defined management and employee responsibilities for fire safety within the premises in accordance with statutory requirements.
2. Provision of relevant training on fire safety for employees from all sections.
3. Provision of adequate fire warning systems, means of escape and firefighting equipment, with good housekeeping practices to minimize the risk of fire.
4. A system of assessing structural and other fire protection needs in the premises, determining fire priorities and the allocation of funds for the completion of agreed works about fire safety, considering other established priorities.

15.27 Guiding Principles

1. Fire precautions will comply with The Occupational Safety and Health Act 2007. These will include safe installation and use of electricity and gas and special instructions on smoking and the disposal of cigarettes;
2. Adequate and suitable means of extinguishing fire must be provided in applicable workplaces;
3. Fire exits will be provided for every workplace, properly marked and kept clear of obstructions, allowing swift and safe exit during emergencies. Employees will be regularly drilled on evacuation procedures;
4. There will be fire-drills for employees on a yearly basis, records of which will be kept;
5. The Fire Marshall Officers shall be responsible for ensuring that staff receive adequate fire training and that nominated fire officers are designated in all company premises. Their responsibilities are to:
    a) Report and advice on the standards of fire safety in the Company's premises and the standards of fire training of its staff.
    b) Undertake overall responsibility for fire training.

c) Assist in the investigation of all fires in the Company's premises and to submit reports of such incidents.

15.28 Organization and Management

In addition to ensuring that all statutory requirements relating to fire safety and fire precautions are observed within its premises, Centum has appropriate fire safety policies and programs in place.

Specifically, Centum has:

1. A clearly defined Fire Safety Policy;
2. Installed and satisfactorily maintained adequate levels of fire precautions in every part of the premises. These precautions are designed to prevent the occurrence of fire, to ensure its detection and to stop its spread. These precautions include:
    a) A means of raising the alarm in case of fire.
    b) Provision of suitable first line of action firefighting equipment
    c) Suitable means of evacuation of visitors and employees in an emergency

15.28.1 Management's Responsibilities

Centum's management shall be responsible for the following with regard to fire safety:

1. Taking all possible measures to ensure overall safety of all employees and visitors to the premise;
2. Ensuring that sufficient and suitable firefighting equipment are in place
3. Maintaining good housekeeping standards to minimize risks of fire;
4. Ensuring that fire warning systems, emergency lighting, firefighting and fire protection elements are regularly serviced;
5. Implementing any changes necessitated by statutory changes and communicating the same to employees where necessary;
6. Formation of a firefighting team and facilitating training of employees on basic use of fire equipment and general fire safety;
7. Taking deterrent measures against employees and visitors who may violate the fire safety arrangements.

15.28.2 Safety Officer and Coordinator

The Safety Officer will be responsible for operational matters to ensure that all fire detection systems and firefighting equipment are:

1. In good working order
2. Subject to a robust planned preventative maintenance schedule
3. In the most appropriate location
4. Correctly assigned type in respect to the anticipated class of fire.

The Safety Officer will in addition of having responsibility for future developments of both equipment and buildings and ensuring the availability of advice on technical matters from a specialized Fire Safety Advisor and shall be responsible for the following: -

1. Ensure regular and appropriate upgrading of the Fire Policy;
2. Liaise with the Local Fire Authority in matters relating to Fire and which are applicable to Centum;
3. Ensure the awareness levels of employees towards fire and Fire Safety are kept uppermost;
4. Initiate the formation of a Fire Fighting Team (Fire Marshals);

5. Ensure that procedures are in place to undertake fire risk assessments and ensure recommendations are implemented;
6. Receive reports of all fire incidents, appropriately informing the management of their contents, actions taken, and measures taken to avoid recurrence;

15.28.3 Firefighting Team Responsibilities

The fire marshals will be tasked;

1. To ensure that all firefighting appliances, fire detection and alarm systems and any other facilities for fire safety are in place and are regularly serviced.
2. To investigate fire incidences at the workplace and recommend corrective measures
3. Regularly inspect the workplace for purposes of identifying potential fire risks and recommend remedial measures
4. Train other employees in the safe use of fire-fighting appliances
5. Coordination the evacuation of occupants in the event of afire
6. Conduct fire drills at least once in every 12 months and keep records of such drills available for inspection.
7. Each fire fighter shall ensure that fire procedures and emergency numbers are displayed on their workstation notice board.

15.28.4 Duties and Responsibilities of Employees

1. All employees shall acquaint themselves with the company's emergency procedures to be followed in the event of a fire including the use of firefighting equipment (e.g. fire extinguishers, fire hoses, fire alarms) and safety regulations and comply with such directions as may be required from time to time;
2. Ensure his own safety and health and that of other persons who may be affected by his acts or omissions at the workplace;
3. Be responsible for immediate triggering of the fire alarm in the event of a fire that he cannot reasonably expect to extinguish;
4. Co-operate with the fire safety personnel in performance of any duty or requirement in promotion of fire safety;
5. Comply with the safety and health procedures, requirements and instructions given by a person having authority over him for his own or any other person's safety;
6. Report to the fire marshal any situation which he has reason to believe would present a fire risk and which he cannot correct;
7. Keep all gangways and access routes to firefighting equipment clear.

15.28.5 Employee Training

Immediately a new employee is recruited to Centum he will be inducted in the following:

1. Actions to be taken on discovering afire;
2. Actions to be taken on hearing the fire alarm;
3. The location of the fire alarm activation points;
4. The location of fire exits;
5. The location and types of fire extinguishers;
6. Safe use of fire appliances;
7. The location of the fire assembly point.

15.29 Fire Protection Regulations

1. Persons refusing to respect the fire safety policy in Centum should be reported to the immediate supervisor or management for action.
2. Acts of tampering or vandalizing of fire protection devices (firefighting equipment, fire detectors, fire alarms, fire emergency routes, fire exit doors, fire emergency lights, etc.) should be reported immediately to the management
3. Electricity is one of the most common causes of fire.
    a) Never overload electrical circuits and avoid use of long multiple extension cords. Consult the electrician when considering increases in electrical current demand;
    b) Defective electrical equipment, lose connections and overheating
    c) equipment should be appropriately tagged 'out of service' without
    d) delay and reported to the management for rectification;
4. "Hot work" may only begin upon issuance of a work permit. This includes any welding, cutting using power tools e.g. grinders, general grinding or any other activity involving open flames, sparks, or other ignition sources which may cause smoke or fire;
5. Anyone discovering smoke, strong smell of burning or smell of unusual nature should immediately report to the Safety Officer or Supervisor or fire fighters or whoever is close;
6. All emergency exit doors must be properly labeled and kept free of any obstructions.
7. Emergency telephone numbers and fire action procedures will be displayed at a strategic/conspicuous place for the occupants' prompt information for action in event of a fire emergency.

15.30 Fire Emergency Plan

1. Break-glass call points or any other suitable means for triggering the fire alarm are provided at some strategic places. Every employee is authorized to activate the alarm in the event of a fire. The alarm may also be automatically activated by fire/smoke detectors fitted in the workplace.
2. Once a fire alarm is triggered, the Fire Marshal(s) on duty shall take charge
3. until the fire is extinguished or until the arrival of the Safety Officer and
4. Coordinator or Fire Brigade.
5. Telephone numbers of the fire brigade, the local police station, ambulance services and other considered useful numbers are prominently displayed at appropriate place(s)
6. A designated Fire Assembly Point is provided and well-marked outside the work place.

Prior to the arrival of the Fire Brigade (if need be), it shall be the duty of the fire marshal(s) to ensure that the premises is cleared of persons in the buildings in the event of a serious fire. Once vacated, the built-up areas shall remain out of bounds to employees and visitors until certified safe by the relevant authorities.

15.31 Fire Reporting

Centum recognizes that the collection of data from fire incidents in the premises is important and lessons can be learnt from routine reports.

Serious fire incidences involving death, serious injury, closure and/or serious damage to the premises or its contents must be reported to the police, Ministry of Labour and insurance agents as appropriate.

15.32 Fire Training Records

The HR department shall be responsible for facilitating and keeping custody of all training records. Such records shall be referred to when selecting employees to undergo the annual refresher training.

15.33 General Fire Safety Provisions

15.33.1 Fire Alarm

The fire alarm systems shall be serviced at intervals not exceeding six months.

15.33.2 Fire Fighting Equipment

Appropriate types of firefighting equipment shall be provided and installed at strategic, favorably accessible positions as recommended by the service provider or fire safety advisor. Fire marshals shall be responsible for ensuring that the firefighting equipment are accessible at all times. Such equipment shall be serviced by the appointed service provider at intervals not exceeding six months

15.33.3 Access to Fire Fighting Appliances

All routes to firefighting equipment shall be kept clear at all times. It is the responsibility of all employees within Centum to ensure that this requirement is strictly adhered to.

15.34 Uniforms and Protective Clothing

Centum shall provide protective clothing, Uniforms and other necessary equipment to Employees whose work requires the use of the same. Uniforms will be issued in two pairs once in a year, at regular intervals. Protective clothing will be provided whenever required and on assignments basis to employees undertaking such tasks.

Dust coats, Leather Gloves, Safety Boots and Dust Masks will be provided to employees if required. All personnel provided with safety and protective clothing will be trained on how to use them. They will also be required to use them and take responsibility for doing so at all times while on duty.

15.35 Work Injury and Compensation

Work injury insurance benefits provide for compensation to employees for work related injuries contracted during their employment.

An employee is not entitled to compensation if an accident, not resulting in serious disablement or death, is caused by the deliberate and willful misconduct of the employee.

16 STAFF WELFARE & MENTAL HEALTH

16.1 Policy Statement

Centum is committed to supporting the mental health and well-being of our employees. We believe that mental health is just as important as physical health, and we are dedicated to creating an environment where employees can thrive, feel supported, and seek help when needed. Through this policy, we aim to reduce stigma, offer resources, and ensure that every employee has the tools and support they need to maintain a healthy balance between work and well-being.

16.2 Policy Objective

We recognize the importance of mental health and overall well-being in fostering a productive, supportive, and engaging workplace. We are committed to providing an environment where employees feel valued, supported, and empowered to take care of their mental and physical health. This policy outlines Centum's approach to promoting well-being, addressing mental health issues, and providing resources and support to employees facing mental health challenges.

16.3 Scope

These guidelines apply to all employees both at the Group and subsidiary level. The company is committed to supporting all individuals in maintaining a healthy work-life balance, confidential, respectful, and supportive manner.

16.4 Key Principles

1. **Supportive Environment**; -We aim to foster a culture where employees feel comfortable discussing mental health and well-being concerns without fear of judgment or stigma.
2. **Prevention and Awareness**; -we believe in proactive measures to prevent mental health issues, raise awareness, and reduce stigma surrounding mental health at the workplace.
3. **Confidentiality**; - Employees seeking support will be treated with confidentiality and respect, and personal information will be handled with care.
4. **Employee Empowerment**; - we encourage employees to take responsibility for their well-being while providing resources, education, and support to help them achieve and maintain good mental health.

16.5 Leaving Centum

When an employee is leaving Centum, a gift, valued at up to Kshs. 40,000, will be given to the individual. The amount spent will further be capped depending on employee tenure. That is;

1. Below 1-year Kshs. 7,500
2. 1- 3 years Kshs. 15,000
3. 3- 5 years Kshs. 25,000
4. 5 years and above Kshs. 40,000

16.5.1 Death in service

In the unfortunate event that an employee or an employee's immediate family members die, Centum will provide assistance as follows:

16.5.2 Centum employee

1. A cash contribution of Kshs. 100,000 will be presented to the bereaved family to aid in the funeral preparations.

2. This is in addition to the assistance detailed below:
    a) Contribution of up to Kshs. 75,000 towards purchase of the coffin;
    b) One hired hearse to transport the body to the burial place at a maximum cost of Kshs. 75,000;
    c) Transport for employees to attend the funeral;
    d) Two newspaper obituary entries;
    e) Any other benefits payable to the employee as per policy (including last expense, group life and Pension).

16.5.3 Child, parent or spouse

Centum staff will organize a visit to the Home/Funeral service to console the employee.
In addition:

1. A contribution of Kshs. 75,000 will be presented to the employee to aid in the funeral preparations;
2. Transport will be provided for employees who wish to attend the funeral; and
3. Transport to a maximum of (three cars) for employees to attend the funeral.

16.5.4 Sibling

Centum employees will organize a visit to the Home/Funeral service to console the employee. In addition, a contribution of Kshs. 40,000 will be presented to the employee to aid in the funeral preparations. The Company will provide transport (two cars) for employees to attend the funeral.

16.6 Mental Health

16.6.1 Support Programs

1. **Employee Assistance Program (EAP)**;- Centum Group provides an Employee Assistance Program offering confidential counseling and support services for employees dealing with personal or work-related stress, anxiety, depression, family issues, or any other mental health concerns.
2. **Mental Health Awareness and Training**; - Regular training sessions, workshops, and seminars on mental health awareness will be offered to help employees recognize signs of mental health issues and learn how to support colleagues facing such challenges. This may include stress management, building resilience, and coping strategies for mental health issues.
3. **Wellness Initiatives**;- Centum Group promotes overall well-being by offering wellness programs, such as fitness challenges, mindfulness sessions, and access to wellness resources. Employees are encouraged to engage in physical activities that promote mental and physical health.

16.6.2 Managing Mental Health in the Workplace

1. **Open Communication**; -Employees are encouraged to communicate openly with their managers or HR about any mental health challenges they may be facing. Managers should ensure employees feel safe and supported in bringing up mental health concerns without fear of discrimination or negative consequences.
2. **Workload Management**; - the company commits to managing workloads to prevent excessive stress and burnout. Managers are encouraged to regularly check in with employees to assess workloads and offer support as needed.
3. **Flexible Work Arrangements**;- Employees experiencing mental health challenges may request flexible work arrangements, such as adjusted hours, remote work, or time off.

These requests will be reviewed on a case-by-case basis to ensure that employees receive the support they need while maintaining work performance.

4. **Mental Health Leave**;- the company provides mental health leave for employees who need time off to focus on their mental health. Employees may access sick leave or personal leave to recover from mental health conditions, and any medical documentation related to mental health will be treated with confidentiality.

16.6.3 Reducing Stigma and Promoting Inclusivity

1. **Mental Health Education**;- the company will regularly provide education and training to raise awareness about mental health, reduce stigma, and encourage a culture of inclusivity. This includes addressing misconceptions about mental illness and promoting empathy in the workplace.
2. **Non-Discrimination**;- Employees will not face discrimination or adverse consequences for seeking help with mental health issues. Centum values diversity and inclusion and recognizes that mental health is a critical component of employee well-being.
3. **Support for Returning to Work**;- Employees returning to work after a mental health-related absence will be supported through a smooth and respectful reintegration process. Reasonable accommodations will be made to help them adjust and succeed in their roles.

16.6.4 Employee Well-Being Resources

1. **Access to Mental Health Professionals**;- ensures access to mental health professionals through the EAP or other external services for employees who require more intensive or long-term support.
2. **Work-Life Balance Resources**;- The company provides resources and guidance on managing work-life balance, helping employees manage personal and professional responsibilities effectively.
3. **Stress Management Tools;-** Employees will be offered access to resources and workshops that teach stress reduction techniques, such as mindfulness, time management, and relaxation exercises.

16.7 Role of Managers

1. **Regular Check-Ins**;- Managers are encouraged to have regular one-on-one check-ins with employees to gauge well-being, listen to concerns, and offer support where needed.
2. **Early Intervention**;- Managers should be trained to identify signs of stress or mental health difficulties in employees. Early intervention and referral to appropriate resources or support services should be prioritized.
3. **Creating a Supportive Environment**;- Managers should foster an environment where employees feel comfortable discussing their well-being. They should actively listen to concerns and make necessary accommodations to support employees facing mental health challenges.

16.8 Reporting and Feedback

1. **Reporting Mechanism**;- Employees who feel that their mental health needs are not being addressed or are facing workplace challenges related to their well-being are encouraged to report concerns through established channels, such as HR or a designated employee support officer.
2. **Feedback on Mental Health Initiatives; -** Employees are encouraged to provide feedback on the effectiveness of mental health and well-being initiatives, so that Centum Group can continuously improve its policies and programs to meet employee needs.

16.9 Monitoring and Review

Centum will regularly monitor and review this policy to ensure its effectiveness in promoting employee well-being and addressing mental health needs. The company will also keep track of employee engagement with well-being resources and programs and make adjustments based on employee feedback.

17 COMMUNICATION

17.1 Policy Statement

Centum recognizes the importance of keeping all the stakeholders accurately informed of the progress, developments and undertakings of the company relevant for their use.

In this regard, this policy provides the guidelines, objectives, means and use of communication to the benefit of all concerned stakeholders. Through such, employees are encouraged to identify with the Company's strategic objectives and to contribute towards its achievement.

17.2 Policy Objective

The objective of this policy is to ensure that communication across Centum is well coordinated, effectively managed and responsive to the diverse information needs of all the stakeholders.

17.3 Scope

This policy applies to internal communication with employees and external communication to other stakeholders.

17.4 Guiding Principle

The use of communication tools and information must be professional, lawful and consistent with one's duties with respect to other stakeholders and in accordance with other rules and procedures of the Company. Care must be taken when using email, company website or internal message boards as a means of communication because all expressions of fact, intention and opinion in a communication may bind the staff and/or the Company.

17.5 Key aspects of the Policy

17.5.1 Group CEO's Forum/Communication

The Group CEO will hold periodic town halls with prior notification. All employees will also be kept abreast of all messages from the Group CEO through emails to ensure that they know within a very short time of all pertinent information that is necessary.

17.5.2 Staff Meetings

Staff meetings are held as defined by the various work areas to enable all employees to learn about the progress within the Company and to contribute to the development of it. They will focus on the major business opportunities/difficulties and to bring about changes and improvements through a common understanding and sharing of business objectives and plans.

For meaningful and effective participation of employees in staff meetings, employees are discouraged from carrying or using their laptops or mobile phones while attending the meeting.

17.5.3 Press/Public Statements

The Investor Relations Department is responsible in communicating information regarding the Company by way of public statements, press release, interviews with the media and other such public statements.

All employees are prohibited from corresponding with newspapers, accept an invitation to broadcast on television or radio on official matters unless authorized to do so by the Director – Corporate Affairs.

An employee must not write to or interview members or give any lecture to the public regarding official matters unless authorized to do so by the Head of Investor Relations and Corporate Communications.

17.5.4 Employee Communication with Centum's Chairman and Board Directors

Centum's Chairman's and Directors' role is to guide Centum's management on its strategic direction. They are not Centum employees and do not get involved in Centum's daily operational decision making or related issues.

Occasionally, an employee may be required to communicate with The Chairman and/or Board on operational issues regarding specific projects implemented by Centum. Employees will be notified by the Group CEO or their immediate supervisor if their involvement is required.

While Centum management embraces open door policy, employees are encouraged to lodge any grievances with their immediate HoDs or appeal to higher authority within Centum, before escalating it to the Board of Directors and/or the Chairman where they are not satisfied with the outcome.

Any requests for information regarding operational or HR related issues must be referred using the provided channels of internal communication.

17.5.5 Business Cards, Letterheads and Signing

As part of their employment with the company, employees may be permitted to carry the Company's business card, use the Company's letterhead or execute agreements on behalf of the Company. In each case employees must ensure that they use them appropriately.

17.5.6 Telephone Etiquette

The telephone is a vital communication instrument in conducting day-to-day business. As a Company representative, the employee should present a courteous and thoughtful manner when they answer the phone. All calls must be answered promptly, use the proper identification, give the caller undivided attention and treat the telephone as one of their most valuable business tools.

17.5.7 Notice Boards

Only notices or publications officially issued may be displayed on the notice boards.

17.5.8 Mobile Phones

There are times when Centum needs to maintain regular contact with specific employees regarding Centum's operations that require immediate action or critical decision-making to avert loss or damage; hence the importance of mobile phones.

However, Centum does not encourage extended use of mobile phones for personal calls during working hours.

While in the office, and/or in the presence of clients, employees should either put their mobile telephones in an appropriate manner to minimize the disruption of the ringtone.

It is unprofessional to take a call or read and reply to a text message (SMS), email or social network notification during an office or client meeting (unless it relates to the meeting or is a work or personal emergency).

17.6 Social Media & Office Communication

17.6.1 Social Media Interaction

We recognize the value of social media as a communication tool but expects all employees, contractors, and affiliates to use it responsibly. When engaging in social media activities, individuals must ensure their posts, comments, and interactions reflect the company's values and uphold its reputation.

Centum Employees should not disclose confidential or proprietary information, make misleading statements, or engage in harmful conduct online that could damage Centum's brand or relationships. While personal social media use is allowed outside of working hours, employees must be mindful that their online behavior may be associated with Centum, and any inappropriate conduct may result in disciplinary action.

Employees must comply with all relevant legal regulations, including those relating to intellectual property, data protection, and online harassment. Content shared on social media must not infringe on the rights of others. Social media interactions must also promote a positive and inclusive environment. Harassment, discrimination, or any form of abusive behavior, whether toward employees, customers, or third parties, will not be tolerated.

17.6.2 WhatsApp Communication Platform

We recognize the role of WhatsApp as an efficient tool for quick, informal communication. However, employees are expected to use WhatsApp solely for work-related matters during business hours and in accordance with the company's communication guidelines. All communication on WhatsApp must remain professional, respectful, and aligned with Centum's core values.

Sensitive or confidential information should not be shared through WhatsApp unless absolutely necessary, and any use of the platform must comply with Centum's data protection and privacy policies. Employees are expected to respond promptly to work-related messages while maintaining a balance with their other duties. Personal communications should be kept separate from work-related discussions to ensure clarity and professionalism in all interactions.

17.7 Internet and Email Usage

ICT facilities are provided to assist with daily work. It is important that they are used responsibly, are not abused, and that individuals understand the legal, professional and ethical obligations that apply to them.

17.7.1 Authorization

Authorization for employees to use Centum ICT facilities will be granted by the Head of HR. Employees will be expected to observe data protection, responsible computer use, copyright design and patents and refrain from defamation and terrorism.

17.7.2 Responsibility

All users are expected to act in a manner that will not cause damage to ICT facilities or disrupt ICT services. Any accidental damage or disruption must be reported as soon as possible their

immediate supervisor or the Head of ICT. Users are responsible for any ICT activity which is initiated under their username.

17.7.3 Use of the Internet

Use of the Internet by employees is encouraged where such use is consistent with their work and with the goals and objectives of Centum in mind. Reasonable personal use is permissible subject to the following:

1. Users must not participate in any online activities that are likely to bring Centum into disrepute, create or transmit material that might be defamatory or incur liability on the part of Centum, or adversely impact on Centum's image.
2. Users must not visit, view or download any material from an internet site which contains illegal or inappropriate material, which includes, but is not limited to, pornography, obscene matter, race hate material, violence condoning messages, criminal skills, terrorism, cults, gambling and illegal drugs.
3. Users must not knowingly introduce any form of computer virus into Centum's computer network.
4. Personal use of the internet must not cause an increase for significant resource demand, e.g. storage, capacity, speed or degrade system performance.
5. Users must not "hack into" unauthorized areas.
6. Users must not download commercial software or any copyrighted materials belonging to third parties, unless such downloads are covered or permitted under a commercial agreement or other such license.
7. Users must not use the internet for personal financial gain while at work.
8. Users must not use the Internet for illegal or criminal activities, such as, but not limited to, software and music piracy, terrorism, fraud, or the sale of illegal drugs.
9. Users must not use the internet to send offensive or harassing material to other users.
10. Use of the internet for personal reasons (e.g. online banking, shopping, information surfing) must be limited, reasonable and done only during non-work time such as lunch-time.
11. Use of gambling sites, online auction sites and social networking sites such as, but not limited to, Facebook, LinkedIn, YouTube, Twitter, Bebo, Flickr, MySpace etc. is not encouraged during working hours.

17.7.4 Use of Email

Emails sent or received on the email system form part of the official records of Centum; they are not private property. Centum does not recognise any right of employees to impose restrictions on disclosure of emails within Centum. Emails may be disclosed under prevailing legislation, as part of legal proceedings (e.g. tribunals), and as part of disciplinary proceedings. Users are responsible for all actions relating to their email account and should therefore make every effort to ensure no other person has access to their account.

When using Centum email, users must:

1. Ensure they do not disrupt Centum's wider IT systems or cause an increase for significant resource demand in storage, capacity, speed or system performance e.g. by sending large attachment to a large number of internal recipients.
2. Ensure they do not harm Centum's reputation, bring it into disrepute, incur liability on the part of Centum, or adversely impact on its image.
3. Not seek to gain access to restricted areas of the network or other "hacking activities" is strictly forbidden.

4. Not use email for the creation, retention or distribution of disruptive or offensive messages, images, materials or software that include offensive or abusive comments about ethnicity or nationality, gender, disabilities, age, sexual orientation, appearance, religious beliefs and practices, political beliefs or social background; employees who receive emails with this content from other Centum employees should report the matter to their immediate supervisor.
5. Not send email messages that might reasonably be considered by recipients to be bullying, harassing, abusive, malicious, discriminatory, defamatory, and libelous or contain illegal or offensive material, or foul language.
6. Not upload, download, use, retain, distribute, or disseminate any images, text, materials, or software which might reasonably be considered indecent, obscene, pornographic, or illegal.
7. Not engage in any activity that is likely to:
    a) Corrupt or destroy other users' data or disrupt the work of other users;
    b) Waste employee effort or Centum resources, or engage in activities that serve to deny service to other users;
    c) Be outside of the scope of normal work-related duties – for example, unauthorized selling/advertising of goods and services;
    d) Affect or have the potential to affect the performance of damage or overload the
    e) Company system, network, and/or external communications in any way;
    f) Be a breach of copyright or license provision with respect to both programs and data, including intellectual property rights.
8. Not send chain letters or joke emails from a Centum account.
9. Employees should observe email courtesy and direct their email to relevant recipients at all times.
10. Personal use of the Company email is not permitted.

17.8 Good Practice

Centum has good practice guidelines for dealing with email when users are out of the office. When activating the "out of office" facility messages should name an alternative employee for correspondents to contact if necessary. This will ensure that any important messages are picked up and dealt with within required timescales.

During periods of absence when highly important emails are anticipated, the employee (or manager) should make arrangements for notification and access by another appropriate user.

Where sensitive and confidential information needs to be sent via email for practical reasons, please be aware that email is essentially a non-confidential means of communication. Emails can easily be forwarded or archived without the original sender's knowledge. They may be read by persons other than those they are intended for.

Employees must exercise due care when writing emails to avoid being rude or unnecessarily terse. Emails sent from Centum may be interpreted by others as Centum statements. Employees are responsible for ensuring that their content and tone is appropriate. Emails often need to be as formal and business-like as other forms of written correspondence.

Employees should delete all personal emails and attachments when they have been read and should also delete all unsolicited junk mail. In the process of archiving emails, users should ensure inappropriate material is not archived.

Centum provides a current and up to date automatic virus checker on all networked computers. However, caution must be taken when opening any attachments or emails from unknown senders. Employees must best endeavour to ensure that any file downloaded from the internet is done so from a reliable source. It is a disciplinary offence to disable the virus checker.
Any concerns about external emails, including files containing attachments, should be discussed with the immediate supervisor and Head of ICT.

17.9 Legitimate Access to Prohibited Material

There may be circumstances where employees feel that the nature of their work means that they are required to access or use material prohibited under this policy. If so, this should be discussed with the immediate supervisor. Centum is legally responsible for the content and nature of all materials stored on/accessed from its network.

17.10 Remote Users

Employees may sometimes need to use Centum equipment and access the Centum network while working remotely, whether from home or while travelling. The standards set out in this document apply whether or not Centum equipment and resources are being used remotely.

17.11 Monitoring

All resources of Centum including computers, email, and voicemail are provided for legitimate use. If there are occasions where it is deemed necessary to examine data beyond that of the normal business activity of Centum then, at any time and without prior notice, Centum maintains the right to examine any systems and inspect and review all data recorded in those systems. This will be undertaken by authorised staff only. Any information stored on a computer, whether the information is contained on a hard drive, USB pen or in any other manner may be subject to scrutiny by Centum.

This examination helps ensure compliance with internal policies and the law. It supports the performance of internal investigations and assists in the management of information systems.

Employees in breach of these regulations may have access to Centum's ICT facilities restricted or withdrawn.

Breaches of these regulations may be dealt with under Centum's disciplinary procedures.
It may lead to termination of employment from Centum.
Where appropriate, breaches of the law will be reported to the relevant authorities.

18 PROPERTY RIGHTS

18.1 Policy Statement

All employees are held responsible for proper handling of the equipment at their disposal. Inventories will be drawn up regularly and employees will return the equipment they use to the department in charge on termination of employment. In case of damage to company property due to negligence, the responsible employee will be liable to effect payment for the damaged property or equipment. This applies to all employees, materials and equipment irrespective of rank of the employee, or the value of the item involved.

18.2 Policy Objective

The objective of this policy is to systematically safeguard all Centum's property, equipment, documents and information from damage, misuse and theft. In all matters, Centum is committed to a policy of preventive security and to the speedy recovery of its assets if lost, damaged, misused or otherwise applied to the company's detriment.

18.3 Documents

Key documents include Human Resources Policies and Procedures Manual, admin policies and procedures and the ICT Manual.

18.4 Procedure

Each year end, Centum shall take inventories in order to evaluate the state of its property.

19 TRAVEL

19.1 Policy Statement

Some of the Company's duties may require that staff travel within the country and overseas. Centum will endeavour to provide official transport to employees at the most expeditious and reasonable cost, whenever their respective duties call for travel. Where official transport is not available, the Company shall make reimbursement of travel expenses incurred by the employee.

19.2 Policy Objective

The purpose of the policy is to:

1. Ensure the most cost-effective means of travel and promote economy and efficiency in the expenditure of travel funds;
2. Establish standards to ensure:
    a) Travel expenses are proper, reasonable and necessary;
    b) Accountability for claim requests and approvals;
    c) Employees do not personally gain or indulge themselves at company expense.
    d) Provide and promote alternatives to travel when on the Company business.

19.3 Guiding Principles

Official transport will be provided under the following circumstances:

1. When traveling on duty
2. When traveling on permanent transfer from one station to another
3. When traveling to and from a distant station for obtaining medical treatment provided that the required medical attention is not available at the duty station.

19.4 Authorization of Travel

All travel (in-country and overseas) must be approved and the employee will be required to complete the online form.

19.5 Travel Allowance

19.5.1 Travel within Kenya

An employee on job related travel shall receive a per diem allowance and any related travel allowance, to cover the cost of expenses outside working station. The rates shall be as determined and approved by the Board from time to time to ensure that they reflect prevailing economic conditions.

19.5.2 Travel Allowance outside Kenya

The per diem allowance outside Kenya shall be provided in accordance with the approved rates.

19.5.3 Travel Imprest

Temporary imprest shall be issued to employees for specific purposes and will be accounted for by submission of cash receipts and/or cash to ensure that;

1. Imprest is issued for approved travel;
2. Proper approval systems are followed before making imprest payments;
3. Reasonable amounts are paid out as imprests;
4. Imprest is promptly and fully accounted for with appropriate supporting documents;
5. Travel requiring imprest is adequately planned for in advance.

Reconciliation of temporary imprest must be made within 72 hours after the purpose for which the imprest was applied for has been fulfilled. Failure to comply will be considered a gross misconduct.

19.5.4 Application for Travel Imprest

The approved application shall be submitted to the finance department at least one week (5 working days) before the date on which funds are required.

19.6 Allowable Transportation

The following allowable transportation may be considered where it is economical or saving of time is paramount;

1. Common Carrier for example Train, taxi, bus
2. Air Travel
3. Personal Vehicle – with Mileage Allowance
4. Company Cars- Should not be driven past 7.00 pm/19.00 hrs.

20 SEPARATION FROM EMPLOYMENT

20.1 Policy Statement

It is Centum's policy that separating employees will be dealt with dignity and fairness. However, there may be instances where the attitude taken by the employee in terminating will cause the Company to act to protect its own interests. Such a case could include the employee's failure to give proper notice of leaving or taking Company documents or other property when he leaves. In such cases, the Company may deny benefits or refuse to accept notice or pay for any notice given. Where these conditions do not apply, the separating employee shall be eligible for all due benefits.

20.2 Methods of Separation

1. Resignation
2. Termination
3. Retirement
4. Retirement on medical grounds
5. Redundancy
6. Dismissal
7. Death
8. Expiry of contract

20.2.1 Termination & Resignation

Service may be terminated by either party giving 30 days' notice or salary in lieu of notice or as specified in accordance with the terms and conditions set out in the contract of employment. The reason for termination shall be given by the party terminating the services.

20.2.2 Retirement on Medical Grounds

Centum may retire an employee, or the employee may retire if the health conditions of an employee are such that they cannot perform the function for which they were engaged and will not be able to be employed in future. Otherwise, termination on medical grounds will apply.

The HR department with the approval of the Group CEO shall decide for the employee to be examined by a doctor approved by the Company who shall make recommendations to the Company. The Company may retire/terminate the employee based on the doctor's recommendation.

However, if the sick employee's doctor recommends otherwise, parties may resort to a medical board to assess and give a final opinion on whether or not the said employee should be retired/terminated on medical grounds. Before an employee is retired on medical grounds, they will be given an oral hearing in the presence of the employee's employee of choice.

20.2.3 Retirement

Employees shall leave service at the end of the month following attainment of age of 60 years. The company will take all stringent measures to ensure employees are adequately prepared for retirement e.g. through training, counselling.

The company will appreciate the retiring employee's contribution through a retirement observance of each retiring employee in the form of a company sponsored dinner, reception or similar gathering for the retiree, his family and fellow employees. A nominal gift will also be provided. Retiring employees will be eligible for payment of their full pension.

An employee who resigns before attainment of the official retirement age will be eligible for payment of their pension contribution. The employer's contribution will be withheld pending the resigning employee's confirmation of the scheme where he wishes to have the funds transferred to.

20.2.4 Redundancy

These are initiated when one or more jobs are eliminated because of various situations such as declining volume in business, reduced funding or discounted functions or operations.

Centum will endeavor to avoid redundancies through proper business and Human Resource planning.

If for any reason the need to declare redundancy occurs within the Company, the due process of the law will be followed.

20.2.5 Expiry of Contract

This will be as stipulated in the signed contract agreement.

20.2.6 Dismissal

Centum may dismiss an employee as stipulated herein on the disciplinary procedures.

20.2.7 Death

The HRM will facilitate the separation process in the event of the death of an employee in service.

It is mandatory that every employee indicate their next of kin and nominate a beneficiary in their personal contacts. This information will be held in the employee's HR file. It is also the responsibility of the employee to inform the HRM or the Head of HR in writing, of any changes to their next of kin and Beneficiary as provided for in the RBA.

This indicated next of kin will be the **sole contact** person with Centum during this separation and proof of their identity and relationship to the deceased employee will be confirmed on commencement of the separation process.

Centum will not get involved in any family or legal disputes with the deceased employee's family members.

Terminal benefits will only be paid to the nominated Beneficiary upon completion of the clearance process, including handing over any company property held off-site by the employee to the deceased employee's immediate manager.

20.3 Exit Procedure

1. The Head of HR shall ensure proper clearance and hand over is done by all employees leaving Centum.
2. Final payment of dues and/or benefits to an employee is dependent upon completion of clearance and hand over. If an employee fails to return company property, the Company reserves the right to offset the value of such property against the employee's salary and non-statutory dues.

20.3.1 Exit Interviews

Exit interviews will be carried out by HR to obtain feedback from departing employees concerning working conditions, policies, supervision, organisational culture and other matters related to their employment with the company. Centum will use the information obtained from exit interviews to identify problem areas and to consider changes for improvement. An exit interview form will be given to the employee to fill at least 1 week prior to the departure date. The form is included in **Appendix 12** of this manual. The exit interview is voluntary; however, this is encouraged.

20.4 Certificate of Service

It is the policy of the company to give a certificate of service to employees who resign or otherwise must leave the Company. The certificate service duration and position held.

20.5 Retention of Employee's HR File

Centum will retain a former employee's HR file for up to seven (7) years after separation from employment as per the provisions of the Employment Act, 2007.

21 20.0 GROUP PROMOTION

21.1 Policy Statement

Centum Group recognizes the importance of career advancement of its employees and has established this policy to provide the overall framework to guide promotion of employees at work. A promotion refers to the appointment of an employee to handle a job with greater responsibilities and more delegated authority than in their previous job.

The Promotion Policy is based on the recognition that in the course of meeting organizational objectives, the duties and functions of an employee may change in complexity and responsibility. Promotions, therefore, are based on status changes that involve increasing responsibility levels. The added benefits of promotion serve as an incentive for better work performance, enhance morale and create a sense of individual achievement and recognition. While good past performance enhances the validity of the promotion, it should not, of itself, be the primary nor sole reason for recommending a candidate for promotion. Fairness, transparency, and objectivity in the promotion process are critical for its effectiveness. Discipline in adhering to the process is critical to ensure credibility and acceptance across the Group.

21.2 Purpose of policy

This policy presents the guidelines and criteria for advancing and promoting employees from within the company. We want to invest in our employees and reward those who perform well.

Centum Group's goal is to ensure maximum opportunity for promotion based on merit from within, consistent with the commitment to organizational needs, equal opportunity and applicable contractual agreements.

21.3 Scope/Eligibility

This policy applies to all employees of Centum Group who have successfully completed their probation. For clarity, employees who are currently on a Performance Improvement Plan or those going through a disciplinary process would not be eligible for promotion.

Employees may be promoted within the same or another department or subsidiary of Centum Group. Line managers will assess an employee's promotability based on the requirements of the position as detailed in the Job Description and not the qualities, skills or knowledge of the incumbent.

21.4 Circumstances for Promotion

1. A reclassification of the individual's existing position as a result of the individual performing duties at a higher degree of responsibility and complexity than the current classification calls for. This requires an audit of the position through the job evaluation process.
2. The filling of an existing higher-level vacancy by a promotable individual at a lower classification when the job opening has been posted

3. Natural job progression based on sustained high performance, potential and aspiration, this promotion to be done as part of the end of year performance review.

The criteria used when considering employees' qualifications for promotion must be fair and unbiased, and in line with Centum Group's employment policy requirements. These requirements must be fully met and documented. Employees are to be considered for promotion regardless of age, sex, race, color, national origin or disability.

21.5 Promotion Criteria

Employees will be promoted based on their performance and workplace conduct. The proposed promotion criteria consist of the following:

1. **Length of service on current job and classification in the organization.** For an employee to qualify for promotion, he/she should have served the organization in the current job and grade for at least 12 months. It is expected that within this period, an employee would have honed their knowledge, skills and abilities in the role, and been able to add value to the organization.
2. **Performance on the job.** An employee should have demonstrated high performance on the current role, in the most recent 12 months. The expected Overall level of performance should be 'Above Target' OR 'On target'. An employee with an overall performance rated 'Below Target' in the most recent 12 months would not be eligible for promotion. In addition, an employee who is currently on a Performance Improvement Plan would not be eligible.
3. **Potential and aspiration for progression**. An employee should demonstrate potential and aspiration for handling greater and higher responsibilities in the organization. The employee should demonstrate personal motivation and willingness for a change in responsibilities. Employees who demonstrate at least moderate and high potential and aspiration for growth would be eligible. Those who demonstrate low potential and aspiration for growth would not be eligible.
4. **Fit for the new role**. It is important to assess the employee's fit for the new role, by establishing their competence level, their attitudes and readiness for the greater responsibilities. Using the Competency framework, the Line Manager would be able to ascertain the employee's current competency level and identify their potential development areas. The Line Manager to also consider feedback about the employee to understand how the employee's key stakeholders perceive his likely fit to the new level. Promotion will only be to the next classification/ level in the organization structure or as determined through the outputs of Job evaluation.
5. **Conduct**. The employee should demonstrate good conduct and behaviors in line with the Group's values. An employee who has had discipline issues within the previous 12 months and has an active warning letter would not be eligible for promotion.
6. **Workforce plans**. HR and the Line Manager should ascertain that there is a job available at the next level, with reference to the workforce plans and the organization structure of the Business Unit.

21.6 Promotion Process during End of Year Performance Review

Here below are the key steps in the Promotion process.

1. Line Manager to assess the employee's performance against the performance goals agreed upon at the beginning of the performance period.
2. Consider feedback received from the employee's key stakeholders
3. In consultation with HR, review the employee's talent mapping on the 9 box grid and conduct for the previous 12 months.

4. Consult HR on the new position's salary range and any new benefits they should present to their team member.
5. Prepare and present the promotion proposals to the Department Head for approval as appropriate, using the Group Promotion template in Appendix 10.
6. Approving manager reviews the justification for the promotion, the proposed grade and salary and approves if all is aligned.
7. Once approval for the promotion is granted, the information to be forwarded to Group HR Manager for preparation of the Promotion letters.
8. The Line Manager communicates to the promoted employee and present the
9. Promotion letter and the Job Description for the new position to the employee.
10. Managers must keep detailed records of the process to support their decisions to promote employees. HR to file a copy of the promotion letter in the employee's file. It is important that these records are well preserved for future reference when necessary.

21.7 Promotion Process following an Internal Job Posting

Centum values the career progression of our staff, therefore, hiring managers are encouraged to post job openings internally. Internal candidates may be given priority in the hiring process since they are already familiar with the Group's culture and expectations.
Managers who post job openings internally should:

1. Consider all applications objectively, based on the predetermined requirements.
2. Determine whether an internal candidate has the skills to perform the job
3. Examine recent performance evaluations of internal candidates.
4. Interview qualified internal candidates.
5. Inform candidates whether they were selected for promotion. After the employee has accepted the job, hiring managers should inform HR and the employee's current supervisor, if appropriate.
6. Keep records of the application review process and note the criteria used to select the candidate for promotion.
7. In consultation with HR, determine the new salary for the employee.
8. HR to prepare the Promotion letter for issuance to the employee by the Hiring Manager.
9. HR to file a copy of the promotion letter in the employee's file.

For effective management of the promotions process, promotions will be implemented with a future date (Back dating of promotions will not be allowed). HR will provide support to the Line Manager and the Approving Manager throughout the process.

21.8 Governance Standards

In accordance with Centum Group policies, Line Managers will be expected to adhere to Group promotion policy and process in order to maintain high standards of fairness, objectivity and transparency. There will be zero tolerance for promotions based on:

1. Line Manager's subjective opinions unsupported by performance evaluations or metrics
2. Discrimination
3. Favoritism
4. Tribalism
5. Nepotism

To avoid such incidents, Line managers must work closely with HR and keep good records of their promotion evaluation process.

21.9 Accountability Matrix (RACI)

Tasks	Immediate Line Manager	Departmental Head	HR	Group COO
Assess employee's suitability for promotion	R	I	C	I
Prepare & present Justification	R	A	C	I
Approve the Promotions	I	R/A	C	I
Prepare Promotion Letters	I	I	R/A	I
Communicate & Issue promotion letters	R/A	I	I	I
Implement salary & grade changes for payroll	I	I	R	A
File a copy of the promotion letter in employee's file	I	I	R/A	I

22 RECOGNITION POLICY GUIDELINES

22.1 Policy objective

The purpose of this Recognition Policy is to acknowledge and celebrate the outstanding contributions of employees at Centum. Recognition plays a vital role in creating a positive and motivating work environment. This policy aims to encourage high performance, foster employee engagement, and ensure that all employees feel valued for their hard work and commitment to Centum's success.

In creating a high-performance culture, recognition is a motivating factor that provides employees with increased job satisfaction and encouragement to perform their jobs more effectively. Recognition programs are excellent motivators and critical to employee retention. When employees are recognized for their accomplishments and done so in a manner that is meaningful to them, they feel appreciated for their efforts and feel their work is valuable.

20.2 Policy Objective

This policy is aimed at providing the guidelines to implementing recognition programs that acknowledge employees' contributions to the overall objectives and effective operations at Centum.

The specific objectives are;

1. To recognize and reward employees who demonstrate exemplary performance, outstanding contributions, or who go beyond the expectations of their role.
2. To foster a culture of appreciation and respect within Centum.
3. To enhance employee motivation, engagement, and retention by ensuring that employees feel valued and their efforts are acknowledged.
4. To align employee behavior with Centum's core values, goals, and strategic objectives.

"Recognition is not a scarce resource. You can't use it up or run out of it."
Susan M. Heathfield, Your Guide to Human Resources

"In the largest sense, people are attracted to that which is celebrated and people do what they are celebrated for."
Dr. Don Clifton

22.2 Importance of Employee Recognition

Employee recognition is an important tool aimed at;

1. Making employees feel valued
2. Foster pride in the Centum brand
3. Improve employee engagement and generate positive feedback
4. Reinforce linkages between employee performance and organizational goals
5. Improve employee motivation and satisfaction
6. Attract and retain employees
7. Create a supportive work environment
8. Reinforce organizational values
9. Increases productivity
10. Builds loyalty and commitment
11. Improve overall organizational success

22.3 Guiding Principles

1. To ensure effectiveness, recognition at Centum is guided by the following principles;
2. Timely – when you see it, recognize it
3. Specific – be clear and concise about what is being praised
4. Transparent – the process and eventual recognition should be clear to all
5. Alignment– recognition is linked to desired behaviors/values and/or performance
6. Sincere – ensure it comes from someone who is respected by the recipient
7. Involvement– Employees at all levels are involved in the development, implementation and evaluation of the recognition programs
8. Relevant – recognition used should be appropriate to the contribution made and reflect preference of the recipient
9. Respectful – recognition should be respectful of workplace diversity
10. Mutually inclusive: Recognition awards are not mutually exclusive of any employee and are devoid of position, age or qualifications

22.4 What is Recognized?

1. Consistent excellence in performance
2. Performance over and above job requirements
3. Client compliments on service
4. Outstanding one-time achievement
5. Contribution to team effectiveness
6. Honoring separating employees/long-term employment
7. Creativity in new and innovative methods and procedures
8. Team players

22.5 Who makes the Recognition Decision?

1. For informal recognition, an employee at any level in the company;
    a. Peer-to-peer,
    b. Supervisor-to-supervised,
    c. Supervised-to-supervisor etc.
2. For formal recognition, the nominee's nomination should be forwarded to the talent and performance committee

22.6 Responsibility

22.6.1 Group HR Manager

1. To clearly define and communicate the processes
2. To guide the process of inclusivity through workshops
3. To evaluate effectiveness of the program

22.6.2 Senior Management

1. To constantly communicate organizational value, goals, objectives and priorities
2. To support the program

22.6.3 All employees

Consistently recognize their peers, bosses and direct reports

22.7 Types of Recognition

Taking the time to provide recognition that is unique to an employee is more meaningful and memorable for the employee and this varies depending on the magnitude of the achievement

22.7.1 Low Cost Recognition Rewards

1. Personal thank you, thank you notes or emails – good deed awards
2. Post on 'recognition board,' bulletin board, newsletters, web site
3. Centums's Hall of Fame – pictures of employees
4. Submit article to local/regional/national newspaper regarding employee's achievement
5. Recognition lunch
6. Certificate or plaque
7. Mugs, pens, tee shirts, etc. with team or the company logo
8. Inexpensive gift related to employee's hobby

Moderate/Higher Cost Recognition Ideas

1. Gift Certificates
2. Trophy
3. An excursion for the department – night out for dinner, bowling, sports event
4. Recognition for successful sales leads to customers who eventually purchase the Centum product

22.8 Forms of Recognition

All Employees within Centum are encouraged to utilize a range of formal and informal talent recognition practices in the workplace that support organizational values, goals, objectives and priorities through positive reinforcement of desired behaviors and performance.

1. Formal: Structured, scheduled activities or events with specific criteria, which are used to recognize employee contributions and accomplishments.
2. Informal: Acknowledgment of day-to-day accomplishments in the workplace through gestures of appreciation, communication and/or feedback. This type of recognition provides the foundation for formal recognition activities and has a greater impact and affects an employee's identification with an organization.

22.9 The Company's Excellence Awards

22.9.1 Responsibilities and Mandate

1. This Policy is sponsored by the Group Chief Executive
2. The ownership of the Policy is with the Group Human Resource Director
3. Individual employees have a collective responsibility of driving the behaviours; culture and performance expected as individuals or in teams.
4. The controlling manager has the responsibility of ensuring that any individual or team deemed to have delivered exceptionally, in any of the 6 categories of the award is nominated for participation.

The Panel of Assessors has the responsibility of ensuring fairness and equity through assessing individual nominations and determining the award winners.

22.9.2 Specific Responsibilities of the Panel of Assessors

1. Develop the code of conduct that sets the expected standards. Code of conduct developed by the Assessors is included in Appendix A.
2. Develop guidelines and criteria for each of the five categories
3. Develop a process map/ flow that highlights how nominations are to be received, processed and the eventual award winners chosen.
4. Devise the probable Rewards for the monthly departmental Awards and the annual
5. Group CEOs Roll of Honor at the 5 levels of Employee of the year, Platinum, Gold, Silver and Bronze. The rewards need to be suitable for individuals as well as teams.
6. Communicate and engage staff on an ongoing basis to ensure awareness.
7. The panel will continuously test the criteria and guidelines to ensure they are inclusive, and reviews will be made on a six-monthly basis to improve and sustain the quality of the awards.

22.9.3 The Company's Excellence Awards Ceremony

1. Recognition of such actions and efforts from staff will be collectively assessed and rewarded in a common way at the Company's Excellence Awards ceremony.
2. All employees are eligible for CO Excellence Awards under the various award categories referenced in this Procedure.
3. The HR Business Partner is responsible for official interpretation of this Policy and will be responsible for co-ordination in liaison with the company's Excellence Awards – Panel of Assessors.
4. The excellence Awards will be structured around 6 categories of Risk, Security and
5. Safety category, Customer First category, Operational Excellence category and 14
6. Golden Rules category, Brand Ambassador category and Long Service Awards.
7. The panel of assessors constituted, with a cross-functional representation will, therefore, receive the nominations and perform independent assessment at individual level and thereafter submit the same for moderation by the Moderating Panel.
8. The deliberation of the panel and conduct is further guided by the code of conduct and terms of reference as indicated in the appendix A to this Policy.
9. An award of Gold, Silver or Bronze will be awarded to an individual or team on each category at the departmental level on a monthly basis. The awarding process will be based on the diversity and degree of nominations submitted within each department for the month.
10. In order to build equity in the process; the following are departments or cluster of departments that the Awards will be presented at on a monthly basis; that is:
    a) Centum Investments Company Limited (CICL)
    b) Centum Capital Partners Limited
    c) Nabo Capital
    d) Centum Real Estate (Athena, Pearl Marina, Vipingo Development, Tribus Solutions Group-TSG)
    e) Fund I Companies (Green Blade,KingBeverages,Zohari, Barium)
    f) Centum Business Solutions

All personal tax implications arising out of the Awards will be borne by the Company.

22.9.4 Formal Award Criteria per Category in Excellence Awards

22.9.4.1 Customer First Category – Guidelines & Criteria for Award

Customer First category will focus on thinking customer and ensuring their needs and expectations are made and exceeded. The customer will be both internal and external.

The criterion is based on Customer biased behaviours that are consistently displayed and lead to retention through loyalty and preference from our internal customers. The behaviours are in two categories:

1. Actions that bring our brand essence alive (to be defined)
2. Actions that fulfil customer expectations include: RESPONSIVENESS, OWNERSHIP, QUALITY, INNOVATION (PROBLEM SOLVING) and the WOW (W= Way beyond the expected, O = Owning it personally and W= Win the Hearts) factors.

Under the criteria, each category has a narrative of expected actions and the level of impact on the business leading to an either excellent or outstanding score. (See table1)

Table 1 – Customer List Category

CUSTOMER FIRST			IMPACT	
Contribution Category	**Weighting**	Descriptive Action	Excellent	Outstanding
			2	**4**
RESPONSIVE	**20**	Demonstrates Bias For Action by giving Prompt service.	Gives Prompt service thereby driving efficiency within the function	Gives Prompt service thereby accelerating the achievement of results
WARM AND CARING	**15**	Friendly and welcoming with a genuine smile	Friendly and welcoming with a genuine smile with a **personalised service** that demonstrates care	Friendly and welcoming with a personalised service that demonstrates care **beyond** the call of duty with a memorable experience
OWNERSHIP	**20**	Takes personal accountability for solutions	Takes personal accountability for solutions and **follows through across all areas** to conclusion leading to customer satisfaction	Takes personal accountability for solutions and follows through across all areas to conclusion leading to customer satisfaction and **influences positive change and enhancement in process(es)**
QUALITY	**15**	Getting it Right the First Time	Getting it Right the First Time across the customer journey	**Influences the process** to ensure that the Right Product is available at the Right time and Right place in the Right condition
WOW Factor : **W** - Way beyond the expected, **O** - Own it personally, **W** - Win the hearts	**10**	Delights the customer by going beyond the call of duty in service delivery	Delights the customer by going beyond the call of duty in service delivery	Delights the customer by going beyond the call of duty in service delivery and incorporates all aspects of CUSTOMER FIRST that consistently exceeded customer expectations
INNOVATION (PROBLEM SOLVING)	**20**	Develops new and efficient ways to solve customer problems	Develops new and efficient ways to solving customer problems and drives shared learning	Develops new and efficient ways to solving customer problems and drives shared learning that leads to change in the work environment

22.9.4.2 Operational Excellence Category

The OE category recognizes achievements which exceed the normal performance expectations of a given role or team, both in what is achieved (business excellence) and how it is achieved.

The scope of the awards in this category will reflect all aspects of work including the Operatorial Excellence practices

It is expected that all performance is achieved with integrity, and with a high regard for Centum employees.

The Operational Excellence category recognition Descriptions;

1. **Passion and Urgency:** The team or individual looking for opportunities to go beyond the current task and contributing more than originally planned - going the extra mile.
2. **Performance and Improvement**
    a) The team or individual, delivering on promises and striving to do even better
    b) Identifying opportunities to make value addition and eliminating waste and variation
    c) The team/ individual, measuring and benchmarking key performance areas and using data and improvement tools to drive performance
    d) The team or individual embracing and using appropriate tools to learn before, during and after any activity undertaken.
3. **Delivering a step change business improvement**
    a) Achieving technical excellence or high-quality output through team or individual efforts
    b) Delivering challenging Key Performance Indicators and driving continual improvement
    c) Sharing knowledge and driving good practice across boundaries
4. **Innovation**
    a) Creating and sustaining competitive advantage through well executed team / personal initiative.
    b) Challenging 'the way we've always done things'
    c) Creative problem solving by the team or individual
    d) Building and maintaining trusting relationships with team members to ensure continual 'stretch' and delivery
    e) Considering different perspectives to identify new opportunities for success
    f) My Idea Portal- The most innovative idea shared on My Idea Portal will be recognised and rewarded.

22.9.4.3 Risk, Safety and Security Category

The risk, safety and security category is for the recognition of the contribution of teams or individuals on risk mitigation and management of Safety and security related activities in the company. This category also emphasis on those elements that can be influenced at the individual or team level.

The objectives set for the risk, safety and security category is to encourage Staff to identify safety issues and act to prevent incidents or accidents.

To promote commitment and leadership by Senior Management on issues regarding Safety.

Provide a positive influence on the development and implementation of Safety, Health and Environmental programs in the company.

Provide an avenue for employee initiative regarding Safety, Health, and Environmental activities.

Table 2 – Risk, Safety and Security Category - Individual

	Weight	Individual Awards Category.	
		Excellent	Outstanding
Dimensions on Safety/ Risk		2	4
Consequence of risk elimination.	30	Medium.	High.
Response action.	15	Within the scope of the role.	Beyond the scope of the role.
Impact of the lessons learnt.	30	Medium.	High.
Innovation.	15	Instructed/directed action.	Self/Personnal initiative.
Ownership.	10	someone else (Colleague/Supervisor).	Self.

Table 3 – Risk, Safety and Security Category - Team

	Weight	Functional Areas Awards.			
		Excellent	Outstanding	Min Score.	Max Score.
Score Elements.		2	4		
Safety Targets established and met.	10	Established but not met.	Established & met.	20	40
HSC/SAG meets regularly not more than every 3 months and controlling manager chairs all hsc/sag	10	Meets 3 months, chairing delegated	Meets every month, controlling mngr chairs all sessions	20	40
SHE responsibility included in KRA's.	5	Included but not accomplished	Included & accomplished.	10	20
Implementation of Safety Corrective/Preventive actions.	10	Actions implemente below 80%	Actions implemented 80-100 %	20	40
Medical Examinations conducted.	4	Staff undergo but not all.	All Staff undergo.	8	16
Appropriate PPE provided & used by Workers.	5	Provided but not utilized.	Provided and utilized.	10	20
Trained First Aiders-FA available in work areas and first aid facilities avaialble	5	Available but not adequate.	Adequate & All current.	10	20
Site specific SHE Induction conducted for empoyees.	5	Done but not consistent.	Held monthly.	10	20
Trained Fire Marshals, fire fighting facilities available and fire drills conducted.	6	Available but inadequate & no fire drills	Adequate & forum/fire drills held monthly.	12	24
Recurence of Safety Incidents.	10	some recur.	Zero recurrences	20	40
Workplaces areas cleanliness program available.	5	Available but not implemented	Available and implemented	10	20
Machines/Equipment inspected & well maintained	5	Inspected/maintained but no schedule/irregular	Inspected & maintained on schedule.	10	20
Good environmental friendly practices/materials/products, SHE signs provided and updated	5	Environmental friendly practices employed but not in all areas.	Environmentally friendly practices employed in all areas.	10	20
Safe Operating Procedures provided where applicable	5	Some cases of violations on SOP's	Zero violations on SOP's.	10	20
SHE Communication to Staff.	5	Communication not consistently	communication done consistently.	10	20
Self Workplace Safety Audits programme.	5	Safety Audits done but not weekly	Safety Audits done weekly.	10	20
	100			200	400

22.9.4.4 Golden Rules Category

Upon receipt of nomination for the Golden Rules, the Manager and or panel shall first check under which of the 14 Golden Rules the act/action falls.

Once step one above is finalized it shall then be categorized within the summarized categories as will be determined from time to time.

The manager and/or panel shall be required to categorize the act/action under the areas of impact, this means does the act/action fall under impact on self, impact on others, impact on leaders or impact on the business.

The criteria for Golden Rules category will be defined at the end each of each year and will form part of the guiding principles for the nominations process. The 14 Golden rules applicable will be as follows;

1. We think Positively
2. It's our business; We create and Share value
3. We don't do tomorrow what we could have done yesterday
4. We escalate solutions never the problems
5. We move with speed and when in doubt, we move even faster
6. Good enough is never good enough.
7. We believe that no great business was built working Monday to Friday with a 1-hour lunch break
8. We talk less and deliver more.
9. We do not email where a conversation will do.
10. We think big, enjoy ourselves, learn and teach.
11. A bad decision is better than indecision
12. We get it done!
13. We create tangible wealth
14. Integrity! Integrity! Integrity.

Over and above the Golden Rules Category, employees who are nominated under this category will be required to consistently display the Centum Competencies as follows;

1. Executes Entrepreneurially
2. Thinks Strategically
3. Acts Commercially
4. Drives & Owns Business Results
5. Leads Change and Innovates
6. Develops Self, Team(s) and Leaders
7. Collaborates and Influences
8. Demonstrates Resilience

22.9.4.5 Brand Ambassador Category

A Brand Champion is a Centum Staff who represents the Centum Brand and Company Values in a positive way. This should hopefully then result in a favourable consideration by potential consumers/customers of centum products and services.

This will be applicable to all staff whose core function is not selling or Business development in their respective portfolio companies, however sales staff can sell/promote products of other portfolio companies (other their own where there is different consideration) to benefit from this policy.

This category will ensure that staff who directly sell or successfully refer a client/Partner who eventually purchases any of the Centum products or Partners with Centum group companies is recognized and rewarded (The details of the awards to be agreed year on year).

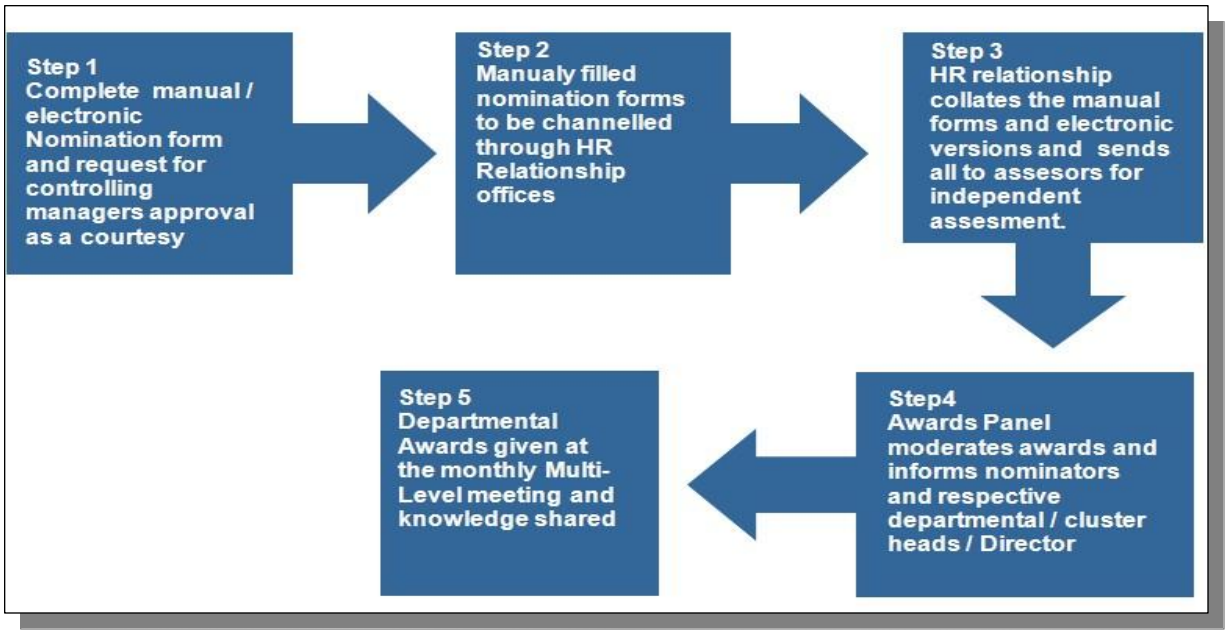
22.9.5 Long Service Awards

These awards are given at Management's discretion as a token of appreciation for staff who served the Company for a minimum of 10 continuous years and in batches of five years thereafter. The Long Service awards will ordinarily be awarded in November/December of every year and are non-contractual in nature. The award will consist of a monetary reward to be determined by the Company and a certificate acknowledging the years served.

22.9.6 Retiree's Award

These awards will be given at Management's discretion as a token of appreciation for staff who served the Company till retirement age. The award will be given upon retirement and are non-contractual in nature the award will consist of a monetary reward the value of which will be determined by the Company.

22.9.7 Process Flow- Application/ Nomination Process



22.9.8 Assessment and Feedback Process

The decision on departmental / cluster awards will be communicated directly to the departmental directors.

Subsequently the event to celebrate and recognize the recipients will be held as per the schedule at the discretion of the department.

The panel will issue an Awards newsletter communicating and providing feedback on the winners of the various categories and level of awards on a monthly basis, this will happen on the following week after submission of the names of winners to the department.

Further feedback and guidance to the process will be provided by the controlling managers and HR relationship Managers.

22.9.9 Frequency and Schedule of Awards

Nominations for the monthly departmental awards is expected to flow in through-out the month, either through manual application nomination forms or online form hosted on the Company's intranet site.

On calendar month close, at the end of the first working week – Friday 17:00hrs; HR relationship will equitably distribute the nominations to the respective panel members.

Each panel member is expected to independently assess and submit his/her assessment on-line or otherwise, by the second Thursday of the new month.

The panel of assessors will schedule to sit on the second Friday of the month and moderate the scores for each of the nominations. The final list of award winners will then be raised and sent to the departmental directors at the end of the seating of the panel.

The third week of the month will therefore be left for the awards to be conferred to the respective winners by the individual department directors.

22.9.10 Annual Awards Gala

There will be an annual forum - **The Group CEO Roll of Honour**, where **'The best of the best'** in the year will be awarded in the order of **Platinum, Gold, Silver, Bronze** and a list of individuals and teams that qualify for recognition.

Additionally, employees who are nominated at least three times in a year from all the categories of companies described above, will be eligible for a final award of **'Employee of the year',** assessed and determined by the panel of assessors based on the overall **magnitude and impact** on the organisation and its stakeholders. Such employee will receive recognition and reward alongside their picture being permanently embossed/placed on the Centum's hall/Wall of fame.

22.9.11 Quality Control

This part of the Policy is meant to give guidelines for addressing concerns that may arise and are directed to the panel regarding the process of selection for the awards. It also gives provision for continuous assessment to conform to existing Policies and improvement on an ongoing basis. Details to the quality control mechanism are as follows:

1. The panel shall have as an agenda item, issues to do with complaints that are officially communicated regarding the selection and award process.
2. The panel with evaluate the issues raised to confirm the authenticity of the same.
3. If confirmed genuine the panel will identify the cause and initiate mitigation process.
4. Mitigation process may include amendments to the criteria of the selection process to capture the identified deficiency or need.
5. In case of human factors such as errors, omission etc as the cause the panel will vet circumstances leading the same. This will confirm whether it was deliberate, premeditated or otherwise.
6. If the human factor issue is confirmed as deliberate and premeditated the panel may nullify that particular selection process, recall the award and take appropriate disciplinary measures on the panellist(s) involved.

7. If the human factors are confirmed to be accidental, the panel may nullify that particular selection process, recall the award but develop mitigation measures to avert the future recurrence of the same.
8. If the complains/concerns are confirmed unfounded, the panel will make a dismissal and the award maintained. It may consider recommending disciplinary action on the source.

22.9.12 Communication of Issues

Questions regarding this Policy should be directed to Group Human Resources Director

22.9.13 Review and Evaluation of the Policy

This policy will be reviewed annually by the HR department to ensure its continued relevance and effectiveness in recognizing and rewarding employee contributions. Changes or updates to the policy shall be communicated to all employees.

23 INTERNSHIP

23.1 Policy Statement

Centum Group realises the immense value of internships to the society by providing meaningful work experiences to students in institutions of higher learning with a view to prepare them for the world of work. This policy provides a framework for the hiring and management of internships across the Group.

23.2 Guiding Principles

1. Promotion of equity and fairness by ensuring inclusivity and accessibility of opportunities to interns from diverse backgrounds at any one time to represent the country's demographics through transparent recruitment and selection procedures.
2. Professionalism in ensuring that the interns are provided with and acquire the practical experience required for their professional and career development. Professionalism can also be encouraged by assisting interns to develop human relations skills, decision-making abilities and management of office activities.
3. Relevance, fit to purpose and quality supervision through ensuring provision of appropriate, relevant meaningful work experience that is commensurate with the intern's qualifications.
4. Efficiency of the internship program based on cost-effectiveness.
5. Compliance with all applicable laws governing Centum operations including the employment and labor related regulations in force.

23.3 Scope of the policy

This policy will apply in the recruitment and management of interns across Centum Group. No interns shall be hired outside of this policy.

23.4 Role & Responsibilities of Centum Group

23.4.1 Role & Responsibilities of the Line Manager

1. Plan and budget for interns to be hired during the financial year.
2. Advertise the internship opportunities through the Centum Career's portal.
3. Conduct a functional induction program for the intern upon reporting.
4. Assign the intern relevant and meaningful work to enable them acquire the required skills and knowledge whilst applying the theoretical concepts learnt in University.
5. Identify and assign a buddy to serve as an informal mentor & guide for the intern.
6. Set clear performance goals for the intern and provide necessary support to the intern.
7. Monitor and evaluate the progress of internship to ascertain how the intern is performing.
8. Provide a report where necessary to the University on the intern's performance during the internship.

23.4.2 Role & Responsibilities of Human Resources

1. Facilitate and coordinate the hiring and management of interns across the Group.
2. In conjunction with the Line Managers, prepare, plan and budget for internships across the Group.
3. Coordinate the recruitment, selection and engagement of interns based on set criteria.
4. Support Line manager in the performance management for the interns.
5. Develop Line managers' capability in supervision & mentoring of interns.
6. Facilitate the administration of intern's allowance and other benefits such as
7. Leave, Medical cover and Group Personal Accident cover.
8. Coordinate the monitoring, assessment & evaluation of interns by the University.
9. Issue a completion of Internship letter to the intern.
10. Comply with relevant legislation that applies to the hiring and management of internship programs.

23.4.3 Role & Responsibilities of Intern

1. Comply with the policies as set out in the Group HR manual and abide by the rules and procedures of the Department where they are assigned.
2. Continually demonstrate commitment and willingness to fully and actively participate in the learning experiences during the Internship.
3. Be ready to be deployed to any relevant office/work station where there may be an internship vacancy.
4. Make effort to acquire relevant skills in the area of specialization.
5. Complete all assignments given and strive to deliver high quality work.
6. Attend to work throughout the internship period and complete the internship program.
7. Provide regular feedback to the Line manager on the progress he/she is making and any challenges thereto with regards to the internship program.
8. Observe confidentiality of information and proper care, use and security of tools/equipment that are placed in their possession in the course of the Internship.

23.5 Internship Guidelines

23.5.1 Planning for Internship Opportunities

All internship opportunities in the Group shall be documented in the Workforce plans per Business Unit at the start of the financial year and as determined by business needs & shall be included in the annual budget. All internship opportunities will be advertised on the Centum Group Career's website and all prospective interns shall apply for the positions through the Career's Portal.

23.5.2 Eligibility

The persons eligible for this program shall be:

1. Students who are currently studying at the University
2. Undertaking the internship as part of the requirements of the Course of study
3. Fresh University graduates, specifically those who have graduated within the past one (1) year.

23.5.3 Duration

The Internship period shall be for a period of 3 to 6 months or for the duration prescribed by the Institution in which they are undertaking their studies.

23.5.4 Selection

The Interns shall be selected as guided by the Centum Group Recruitment and Selection policy. All internship opportunities shall be advertised on the Centum Group Career's website and all interested applicants shall submit their applications online through the Portal. The Head of Human Resources shall ensure that interns are taken through a transparent and fair selection process.

23.5.5 Selection Criteria

1. Merit- should have attained a minimum grade of B+ at KCSE and maintained high GPA (grade point average) of 3.0 or 2nd Class Upper Division at the University.
2. Aptitude test- should pass the set aptitude tests.
3. Disciplined and of good character- should provide a Recommendation letter from the University.
4. Creative and entrepreneurial – should provide a creative and entrepreneurial proposal applicable to the Group as part of the selection process.
5. Diversity and inclusion in terms of gender, ethnicity, disability & minority/marginalized groups.

23.5.6 Internship Agreement

The interns will be issued with an Internship Agreement detailing the effective date of the Agreement, the specific Business Unit they will be assigned to as well as the terms & conditions of the internship.

23.5.7 Placement

The interns who meet the required selection criteria will be placed in departments in line with their career interests and their area of study.

23.5.8 Onboarding & Induction

Interns will be onboarded in line with the Group onboarding process. They will provide all the required personal information & documentation & background checks shall be performed in line with the Group policy. They will be assigned a workstation and the relevant working tools including a telephone and a computer where applicable.

23.5.9 Working hours

Interns will work similar hours as those stated for the Business Unit in which they are hired. It is expected that interns will not be expected to work long hours, but in the eventuality that they do, they would be entitled to Overtime payments as other regular staff.

23.5.10 Internship allowance

Interns will be paid a monthly internship allowance for the duration of the Internship period. Human Resources will guide as to the actual amounts as this would be subject to review.

23.5.11 Insurance

Interns will be covered by the Group Personal Accident for the duration of the internship period. They will also enjoy a medical cover during the internship period.

23.6 Termination of Internship

23.6.1 Termination by the Company

The internship agreement may be terminated by the Group on any of the following grounds:

1. Absence from assigned department without permission or reasonable cause for a period exceeding 24 hours.
2. Reporting to work while inebriated or under the influence of alcohol;
3. Continual failure to complete work assignments to the expected standards iv. involvement in fighting or violent behaviors at the place of work
4. Being charged in a court of law with a criminal offence;
5. Willful destruction of Group's property or willful neglect of responsibilities resulting in potential losses to the Group
6. Refusal to obey lawful instructions.

23.6.2 Termination by the Intern

An intern may terminate the contract by:

1. Submitting a written letter of resignation/termination of the contract to the Head of Human Resources through the Line Manager giving a one month's notice.
2. Giving a two weeks' notice before taking up employment offered to him/her before the expiry of the agreed internship period.
3. The Group reserves the right to terminate a contract with an intern at any point during the specified period. Notice for the termination of the contract will be as per the requirements set out in the contract.

23.7 Completion of Internship Program

1. Towards the end of the internship period, the intern will prepare and submit report to the Line manager detailing the responsibilities handled, their key achievements, lessons learned and ideas on improving efficiency and or effectiveness in the Department they worked in, or across the Group.
2. Upon completion of internship the Line Manager will undertake a performance appraisal of the intern with a view to providing feedback on the intern's overall performance and areas for continued development. The Line Manager will submit this assessment to the Head of Human Resources. In addition, the Line Manager may be required to submit a report to the University on the intern's performance during the internship.
3. At the end of the internship, Human Resources will issue the intern with an
4. Internship completion letter (refer to Appendix A).

23.8 Monitoring of the Internship Program

The Head of Human Resources will continually monitor the effectiveness and value of the internship program.

23.9 Review of the Policy

This policy shall be reviewed every two years by the Head of Human Resources.

24 PROCEDURES FOR REVISION

All policies and procedures will be subject to modification, amendments and further development from time to time. It will be the responsibility of the Head HR to ensure that the policy document is reviewed regularly to reflect changes arising both from within the company and from the government legislatures. The changes will include:

1. Changes in the overall strategies and objectives of the company;
2. Statutory changes or legal decisions;
3. Changes to policies in other functional areas of Centum;
4. Changes in management, processes and/or organisational requirements in various functional areas; and
5. Views of employees as appropriate.

The HRM will submit revisions to the manual to the Group CEO and the Ex-Co for approval together with a report justifying the changes. These changes to the manual will be authorized by the Group HRM and will be accompanied by an appropriate substitute page for insertion in the manual. Once approved, all policy amendments shall be communicated to staff by the Head of HR.

The policies included in this manual supersede all prior Centum policies, procedures, practices, customs, or agreements. This HR Manual therefore constitutes terms of employment and conditions of service for all employees of Centum.

Every employee shall have a copy of the HR Manual, and all employees having read the document shall sign a form acknowledging the reading, understanding and compliance of the policies contained in the manual.

ANNEX

Annex 1: Employee Acknowledgement Form

I, ……. hereby acknowledge receipt of the Centum HR Policies and Procedures Manual. I understand that it is my responsibility to read, understand, and comply with the policies and guidelines outlined in the manual. I am aware that the manual is subject to change, and I will be notified of any updates or revisions.

By signing this acknowledgment, I confirm that I have been provided with access to the HR Manual and that I have had the opportunity to ask any questions regarding its contents.

Employee Name: _____
Employee ID: _____
Department: _____
Date: _____

This signed acknowledgement document shall be kept in staffs' personnel files.